

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 12-1 Balance of Multiple-uses

Letter: 1614 If official policy is to initiate professional management consistent with the published goals of sustainable ecosystems management then assume responsibility for balancing multiple uses of public forests INCLUDING TIMBER PRODUCTION with landscape-wide similar ecosystem needs on private forest ownership. The less economic benefits and the fewer tons of wood fiber harvested from national forests, the more intensive and uglier private forest management will inevitably become. The premise of managing public lands to emphasize aesthetic values and down play economics is the ultimate NIMBY attitude.

Letter: 1632 I endorse a significant shift in NF management away from the current levels of timber production to a level that better protects and promotes the other NF resources. Whereas timber will continue to be produced from the NF, I wish to see timber-related training and budget reflect a greater degree of resource protection and monitoring, so that timber can be produced with less environmental degrade than has occurred in the past.

Letter: 1654 This forest is an artificial forest planted as a timber resource. It has become a source of recreation for thousands and a harbor for wildlife. The trails do not negatively impact the environment. In fact they create fly ways for many birds.

Letter: 1674 It is important that we recognize the importance of these areas in maintaining a healthy population of native wildlife and suitable wilderness habitat.

Response: Comment noted

Letter: 1680 Our forests serve as havens for biodiversity and as a natural control system for air quality. To sacrifice this, as well as degrading sustainable recreational use, for the sake of a high yield, short term, economic return is inconsistent with thoughtful land stewardship.

Response: See EIS appendix B for constraints used with all alternatives. These constraints insure that timber harvest levels are at sustainable levels that do not impair the long term productivity of the land. This is in accordance with Section 4 of the MUSYA of 1960.

Letter: 150 Please consider the fact that Texas is known world-wide for it's wild-west image, foreign tourist dollars are real, sustainable income.

Response: The FS strives to maintain NFGT benefiting all mankind. Tourists come to the NFGT for many reasons - camping, swimming, boating, hiking, fishing, hunting or just to relax. The EIS and Plan look at these areas and, while not addressing tourists directly, attempts to provide NFGT everyone can enjoy.

Letter: 399 Far too much emphasis is placed on high paying jobs that destroy the environment and make a select few rich.

Response: The EIS and Plan are not about jobs, but managing the land in an ecosystem manner.

Letter: 1773 I was under the impression that the NF was for "public" use and recreation. Your so called "important decision" (ORV ban) will ultimately force a lot of retired, elderly, or widowed people to move back to the dangerous hustle and bustle of the big cities.

Response: ORVs have been identified as a legitimate use of the NF. It is definitely a recreational pursuit. Our intention is to manage ORVs, to minimize resource damage.

Letter: 1620 All of us have a right to use Public land for recreation. I cannot believe the Forest Service blames ATV use for the problems your agency says the forests are encountering. What about clear cutting?

Response: An ever increasing population, demanding more and more has generated more and more environmental laws and regulations to protect the resources from the increased use and environmental concerns. Restrictions are implemented only to protect the resources and other users.

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Letter: 149 I am continually dismayed at the shortage of places for people to go and the timber priority the FS has, as opposed to recreational. It was supposed to be "our", the people's forest, not a corporate forest.

Letter: 346 Multiple use management has for too long favored logging, which effectively runs other uses for both people and wildlife. While USFWS is working to protect neotropical migrant habitat - the NFS is rapidly destroying it through poor lumber (timber) management

Letter: 368 Too much emphasis is placed on commodity production

Letter: 388 In the Draft management plan too much emphasis is placed on commodity production (much of which will be exported.)

Letter: 1223 Please do your best to maneuver among those quick-cash selfish exploiters who don't give a flip about our children's world.

Letter: 1255 Our bounden duty is to protect them, not to allow one tree to be cut.

Letter: 1265 Our public lands will be the only areas remaining that are wild or where we can protect biodiversity.

Response: One of the purposes of the FS is to supply timber. NF are managed for renewable and non-renewable resources which include "...but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values .. without impairment of the productivity of the land" (FLEMA Section 103 (c)) National parks and monuments were created to preserve. There is no commodity production in a National Park. The NRGTS are part of the FS, not the NPS.

Letter: 233 It stresses the production of forest products at the expense of protecting the environment's streams, soil, wildlife, old-growth timber, and biodiversity

Response: You make some valid points, but remember, timber is sold only when a decision has been made to remove timber for the benefit of the ecosystem. In changing the tax situation, there is an item Congress would have to legislate.

Letter: 1767 The only benefits from USFS to the county seems to be timber production at this time. Please do not take this away by adopting a policy of protection instead of production. What needs protecting is our wildlife not our timber. Increase both law enforcement budget, timber production, continue to fight SPB and do as many controlled burns as possible. I believe these issues are of utmost importance to the citizens, tax payers, landowners, and school students who reap the benefit of timber harvests.

Response: The BLM appreciates your support.

Letter: 982 Please "Hang Tough" and maintain the "timber-forest" emphasis for our east Texas forests.

Letter: 1679 This Draft RP is commodity oriented. It gives only lip service to the other multiple uses.

Response: Harvesting trees as a forest management tool that can achieve multiple objectives, particularly in providing various types of wildlife habitat. The NFMA of 1976 requires that the FS "provide for multiple use and sustained yield of the products and services obtained there from in accordance with the MNSA of 1960, and in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness; and determine for management systems, harvesting levels, and procedures." Not providing for some level of sustained timber harvesting would put us in violation of the law.

Letter: 2116 I understand the NF were established with the multiple use concept in mind. With this includes the harvesting of timber. I . . feel it is good for the surrounding economies.

Letter: 525 Non-consumptive use of public lands must be given priority.

Letter: 1243 Let's put the multiple-use back into our forests.

Letter: 1313 Let's stop this emphasis on commodity production (oil, gas, timber, grazing) and begin managing these national forests and grassland as instructed by law: multiple use management. Perhaps you have forgotten but there are valuable resources on these lands, like wildlife and old growth.

Response: NFs are managed for renewable and nonrenewable resources which include "but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values...without impairment of the productivity of the land..." in accordance with FLEMA Section 103 (c).

PLAN AND ITS COMMENTS
Comments by Issues and Responses

Issue: 12-1

Balance of Multiple-uses

- Letter:** 503 Multi-use cannot be looked at in a vacuum only within the borders of a NF. The NF must be used to fill the gaps in the regional landuse, i.e. if there were not so much private land used for maximum timber production then the role of the NF in East Texas should consider timber production as being one of the more important functions. However, since there is intense timber production on private lands, and little consideration given toward biological diversity, I feel that it is imperative that this new management plan stress these regional deficient uses rather than timber production.
- Letter:** 854 Our NFs were set aside for MULTIPLE uses, but this draft plan seems to be written for maximum use of our forests as a commodity.
- Letter:** 862 I believe we have too long placed more emphasis on timber and mineral production on our NFs than on conservation of those ecosystems. Once these are destroyed they cannot be replaced.
- Letter:** 983 I feel that too much has been devoted to resource production ...and not enough to recreation and wildlife preservation.
- Letter:** 1254 The proposed management plan places too much emphasis on harvesting timber as a resource, and not enough on managing this public land for multiple use.
- Letter:** 1392 A recent survey showed the majority of TX voters want mixed use of our forests. We're tired of the TX and National Forest Services justifying their jobs by catering only to the forest companies' benefit.
- Letter:** 1400 It is important to remember that our national forests are not farms. They are meant to be enjoyed by everyone not just used for profit by a few.
- Letter:** 1434 The original purpose of the National Forests was to provide habitat for wildlife, protection of the land, and recreation as well as economic uses. As you know, the emphasis has been on the latter. It doesn't bother me if lower timber yields from the National Forests makes the price of lumber go up.
- Letter:** 1465 Our national forests belong to the people. Not to the timber and mineral companies.
- Letter:** 1510 The forest was placed here for man's use. It is only worth having if it can be a BENEFIT for the good of mankind.
- Letter:** 1617 There is too much emphasis on commodity production now. Start thinking about ecosystem protection and diversity instead of even-aged management.
- Letter:** 1625 I feel that the high commodity production must be SIGNIFICANTLY lowered, both timber and mineral...
- Letter:** 1632 ...Forest Service management has in favor of timber production to the detriment of other NF resources.

Response: The NREMA of 1976 requires that the FS "provide for multiple use and sustained yield of the products and services obtained there from in accordance with the MURRYA of 1960, and in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness; and determine for management systems, harvesting levels, and procedures." Timber sales are a "tool" used to protect, perpetuate, and improve our NF resources. These are harvested for many reasons ... to maintain or improve the health of timber stands; to create, maintain or improve the health of timber stands; to create, maintain, or improve desirable wildlife habitat; to prevent or control the infestation of insects, disease, windstorms, and fire, and for other reasons. For example, timber sales are used to improve the habitat of the SCOW. Using timber sales, tens of thousands of acres of the habitat have been thinned to be more desirable and some of the monies from the timber sales receipts were used to further improve the habitat by controlling undesirable mid-story vegetation, by installing artificial cavities in trees, etc. See app. B for constraints used that ensure renewable resources are available on perpetuity.

- Letter:** 1765 This State's NF resources may not be raped for the special interests of timber companies, local school districts and county coffers. In any case the latter interests are best served by sustained yield of ASQ and current private forest logging prices being charged for all the logging and other resources removed from this State's NF, the property of ALL the people.

Response: Timber is managed using the ITSY principle as detailed in EIS App B. Timber is sold by sealed bid. NPT timber sales are advertised and sold by sealed bids to the highest bidder. The NPT do not "undercut" the prices private landowners receive for timber. The timber on NPT historically sells for higher prices than other timber sold in the state. The "TX Timber Price Trends" publication shows the NPT have historically received more for timber than private & corporate landowners. There are many, many factors that determine the value of timber, but regardless of the factors, the prices paid for timber on the NPT are the highest statewide & are historically among the highest prices paid for NF timber in the South. Most of the timber sold on the NPT is purchased by small businesses, not large corporations. Historically, small businesses, such as sawmills & independent loggers, have successfully bid for & purchased about 60% of the timber sold.

- Letter:** 1603 Alt 4b requires 44% of the acres outside the HMA (MA-1) to be managed under the all-aged prescription ...to provide for non timber outputs according to the draft EIS (page 11-223). Alt 2 ...vs Alt 4b shows ... Alt 2 has just about the same recreation and wildlife outputs as alt 4b...4b has just 1.5% more Recreation RVD's, 0.7% more Big Game WFD's, 4.4% more Small Game WFD's; and 0.5% more Gray Squirrel acres. Are these the increased benefits of assigning 44% of the MA1 acres to all-aged management? In terms of ASQ, these prescriptions are only about half as productive as the even-aged prescriptions. Lifting this constraint would increase the ASQ by 23 MMBF per year, a 22% increase.

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Issue: 12-1 Balance of Multiple-uses

Response. The constraint on even-aged mgmt was reduced in Alt 8 This gave an increase of 12% from Alt 4B, the preferred in the Draft Plan

Issue: 12-1-1 Commodity use

Letter: 1679 Commodity extraction, including grazing and mineral extraction should not take precedence over recreation Recreation should not take precedence of biological values

Response: Comment noted

Letter 1723 (pg 192-193, DEIS) you have nature study making 15% gains but on page 193, you show a -1%

Response The sentence on pg 192 states "Lifetime activities such as " The paragraph on pg 193 shows projected gains/losses by individual activity

Issue: 12-1-2 No commodity use

Letter: 1668 I think it is important to have a long term, sustainable plan developed where the production of timber and cattle is done entirely on private land, not public land

Response: Comment noted, though this is really a congressional-interest item

Issue: 12-2 Implementation of the Forest Plan

Letter: 1612 Alt 4B should provide the public with a better understanding of management priorities based on expected funding Alt 4B cannot be achieved based on historical levels of funding

Letter: 1723 (pg 27 Summary) you talk about what the impacts of alternatives will be on wildlife Yet we do not have a model today that can accurately predict what will occur in 50 years much less 10 years We are kidding ourselves to believe that these comparisons mean anything They are useless because the money is not even available to implement the plans

Letter 1723 There are no promises of additional law enforcement personnel and yet this is what is needed if such indiscriminant shooting is to be stopped

Response: Comment noted

Letter: 1310 Campgrounds should be self supporting Wildlife doesn't need a budget, it just needs to be given a good habitat, which nature will provide for free, and protection from poachers Range doesn't need a budget, grazing should be self-supporting or stop the grazing and save the taxpayers' money The timber budget could probably be substantially reduced too, especially if unnecessary roads are not built

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 12-2 Implementation of the Forest Plan

Response: Comment noted, though this is really a congressional-interest item

Letter: 1310 With a \$16,000,000 backlog in needed rehabilitation work needed on current campgrounds and recreation sites, it is unrealistic, illusory, and irresponsible to forge ahead with plans for building more campgrounds' Where is the money going to come from?

Response: We are presently in the process of doing rehabilitation work on several areas Costs of replacing old worn out facilities has gotten extremely costly and funding has been scarce

Letter: 1679 The Draft FP is general, not specific Project decisions do not tie back to the EIS thus neither addresses actual environmental impacts What is your planned timber sale program Which areas are you going to cut, and when will they be cut The amount of timber alone is not really a plan, it is just a goal

Response: The revised Plan is a guide to implement the selected alternative The EIS evaluates the environmental effects of the alternatives The choice of a harvest method is based on a site-specific analysis and documented in the project-level environmental documents

Letter: 1723 (pg 230 plan) you need to determine what you consider priority for funding with a realistic budget You budget as if you have unlimited money when this does not occur What would a realistic budget look like in funding all the things you want to do?

Response. We agree, however, budget cannot be used as a constraint

Letter: 1723 (pg 226 plan) the 3 yr implementation plan is too long Two yrs should be the maximum wait period and there needs to be some mechanism to keep from making crucial decisions that will materially effect the resources before the new plan is implemented

Response: Three years is the generally accepted time frame If you have a specific concern that needs a shorter time frame we will be glad to discuss it with you

Letter: 1472 Ecosystem management as described in the DEIS is, in many respects, very labor intensive There will be increased needs for various types of expertise and for a labor force to implement the management strategies It does not appear that funding levels will be sufficient to permit the USFS to do all that will be needed to implement alt 4B

Letter: 1603 The budgets for each of the alternatives are higher than the current budget . The DEIS does not, show what the public could expect given current budget levels Senate Resolution 285 addresses this issue specifically, develop a schedule of management over time based on expected appropriations and the ability to achieve a biological objective over the period of time A phased in approach would also be better able to respond to the social and economic impacts As the schedule is implemented over time, the public will be able to adjust and respond to changing societal demands Any other approach would simply not be realistic, would cause significant impacts without achieving the desired objective, and would be costly

Response: Funding is always a consideration during plan implementation Budgets are estimated based on a "perfect case" scenario, we acknowledge that actual budget & work output will be less We have made this concern clear in all discussions with the public

Letter 1723 (pg 228 Plan) since you have no wetland inventory how will the District be able to determine where wetlands are? You need for all four national forests and the grasslands a complete wetlands inventory done for riparian areas, 100 year floodplains, etc This inventory needs to be done when it rains so you can see where water flows and wetlands are

Response: The BCS provides for methodology for such determinations See plan appendix A for details

Issue: 12-3 General

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 12-3 General

Letter: 1627 Alternative 2 offers a net gain of jobs and the highest gain in income. Those increases provide economic stability and moderate growth to East Texas.

Response: We agree that Alternative 2 offers a net gain of jobs and the highest gain in income. But, we have to manage the forest for a wide array of uses, values, products, and conditions. The alternative preferred reflects the best mix with all considerations.

Issue: 13 PLANNING/PLAN/EIS

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Letter: 1723 (pg 48 DEIS) .I disagree that comments before and after the comment period for scoping did not raise any new significant issues. I feel that my comments did just that after the comment period. But you disagreed. Again a subjective decision but one that needed to be made and was.

Letter: 1723 (pg 3 DEIS) . you say that the preferred alt "best addresses the 15 major issues" that is a subjective statement and depends on the point of view of the person.

Letter: 1723 (pg 235,236 DEIS) . by allowing clearings to be considered forest land you run the risk of overestimating the timber around and what is available for wildlife.

Letter: 1723 (pg 5 DEIS) you say that the "Forest-wide standards and guidelines provide significant protection measures" for ORV use and its impacts on the environment. This is not true. . open riding areas will still be allowed . you still allow riding on trails when it has rained .. I want no riding in rainy weather and until soils dry out after rains. . Protection of forest resources must come first before any play is allowed.

Letter: 1723 (Pg 22 Summary) you talk about how Alt. 6 prohibits ORV use. on page 14 you say nothing about this. You are very confusing in clearly saying what is and is not allowed in alternatives for ORV use.

Letter: 1723 (pg. 24, DEIS Summary) I am in violent opposition to any cutting in special interest areas.

Letter: 1723 (pg 9, LRMP) I oppose the use of any chemicals for uneven age management or other management.

Response: Comment noted.

Letter: 1680 I believe that the FS should heed public sentiment by placing more emphasis on sustainable wilderness conservation, instead of commodity production.

Response: In the record of decision for the FETS, the Regional Forester will select the alternative to serve as the Revised Forest Plan for the next ten to fifteen years. Although public comments are considered in reaching this decision, it is not based on a voting process, but rather the identified ability of the selected alternative to maximize net public benefits. Besides public comments, other factors such as national and regional policy and the analysis of resource opportunities also play a role in reaching this decision.

Letter: 1679 The Draft FP does not have requirements that would eliminate money losing sales.

Response: NFMT timber sales are advertised and sold by sealed bids to the highest bidder. The NFMT do not have a "below cost" timber sale program. Our comprehensive accounting records show the NFMT have not had a "below cost" timber sale program since we started keeping such records. In FY 1994, the NFMT received more than \$15 million in revenue from timber sales, and just spent about \$5 million on timber sales and all the other costs associated with timber sales. The net revenue to the U.S. Government from the timber sale program was about \$10 million. The timber sale program on the NFMT generated about \$2.86 for every \$1.00 of tax dollars spent during the FY.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Letter: 1805 I want a Forest Plan that truly manages for the preservation of a natural native ecosystem.. My children and grandchildren have the right to inherit a true Forest in good condition

Response: Trees, like all living things, do not live forever. When a stand is regenerated new seedlings can become established and the baby trees begin the cycle over again. Trees planted in 1920 are now 60 years old; stands regenerated in 1950 will be 60 years old in 2010, stands regenerated in 1990 will be 60 years old in 2050, and etc. Regeneration ensures today's forests will be here tomorrow. All timber harvest levels in the alternatives of the FEIS are at sustainable levels that do not impair the long term productivity of the land in accordance with Section 6 (3)(E) of the RPA of 1974 as amended.

Letter: 1723 (pg 199 DEIS) uncontrolled and controlled ORV use has been proven to have adverse impacts to vegetation, soil and water values and not, as you say, "may"

Response: ORVs have been identified as a legitimate use of the NF. It is definitely a recreational pursuit. Our intention is to manage ORVs, to minimize resource damage.

Letter: 1632 36 CFR 219.27 inhibits the ability of the FS to adopt less impactful timber mgmt systems as is evidenced by the plan's failure to commit to a single acre of UAM. Predictably, RAM has been endorsed through qualifications (FW-164) sufficient to allow clearcutting of virtually every acre of forest outside of wilderness. The Plan is fundamentally flawed in that it fails to have the authority to adequately address resource degrade and imbalance expressed in the issues and concerns.

Response: Harvest methods are based on a site-specific analysis designed to meet the site's DFC. The environmental impacts are documented in accordance with NEPA. Contract terms and conditions are used to implement the necessary S&G to prevent unacceptable damage.

Letter: 1723 (pg 7 summary) .how many acres will have uneven age management used on them. '

Response: The revised Plan is a guide to implement the selected alternative. The EIS evaluates the environmental effects of the alternatives. The choice of a harvest method is based on a site-specific analysis and documented in the project-level environmental documents.

Letter: 1165 I oppose any plan which would further destroy wildlife habitat or reduce biodiversity

Response: The FS manages for viable populations of wildlife that occur naturally on NFMT. The environmental impacts on wildlife of the different alternatives are analyzed in the EIS.

Letter: 1310 The DEIS is inadequate to support a Forest Plan. It doesn't take a hard look at too many issues. It is biased against selection management and against wilderness, while it is biased in favor of even-aged management and road building.

Response: A range of alternatives with varying amounts of wilderness and selection management acres were analyzed. See Appendix B of the DEIS. As for issues, scoping and public involvement were done in late 1990, more than 4,400 comments representing many diverse viewpoints about Forest management were received and reviewed. Fifteen issues, 53 sub-issues and about 500 unique comments were identified. The 15 major issues are addressed in Chapter 2 of the FLRMP.

Letter: 1603 The Council requests that the Forest evaluate the benefit and cost of this discretionary decision and consider an alternative that manages the MA 1 acres on a younger rotation.

Response: In Alternative 2 we analyzed some shorter rotations. Loblolly of 60 and short and longleaf at 70, which are both less than current no action alternatives. Also, the National direction is for a reduction in the amount of timber volume to be prepared for sale.

Letter: 1603 The Council also suggests that the Forest undertake an analysis planned costs to see if there is some way to achieve targets with less expense.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-1

Adequacy of the Revision(alts, issues, format, analysis)

Response The FORPLAN model was used to rollover outputs as constraints in the selected alternative. In order to produce outputs with the most economical approach, site specific work will be conducted the most efficient way as determined by the District Ranger and staff, this is necessary with the cutback in most government budgets.

Letter: 1603 problems with the FORPLAN 1) the final harvest figure on about half of the yield tables is zero, 2) FORPLAN cannot accurately calculate inventory or growth, and 3) FORPLAN cannot automatically calculate the long term sustained yield (LTSYS) coefficients so the Forest used a special set of LTSYS coefficients which may be in error.

Response: Problems were noted 1) This problem did occur on approximately one-third of the even-age management yield files. This did not occur on the uneven-aged or thinning yield files. No significant change in ASQ or schedule of implementation was noted in rerunning the preferred alternative due to the large percentage of acres being assigned to uneven-aged and thinning prescriptions. These corrections were applied to the final alternative with a reduction of acres forced into uneven-aged management. 2) This problem was identified during the analysis process. The purpose of these values to be calculated within the FORPLAN model were to insure that the cut will not exceed the growth and that timber would be provided in perpetuity. Therefore, constraints of LTSY and NOY were applied. 3) This problem was also identified during the analysis process. The FORPLAN model was only able to automatically calculate LTSY for age dependent yield tables. Therefore, an alternative method had to be determined for the uneven-age and thinning RCW yield files. Therefore, using the formula that was used within the model for age yield tables. Total of all volumes cut over the rotation of a regenerated stand by the number of years within the rotation. The volumes for the uneven-aged were averaged for harvested volumes once uneven-aged conditions were achieved. The following values were used:

Longleaf with use of fire and herbicides	- 0 238 MCF/Acre
Longleaf without	- 0 157 MCF/Acre
Loblolly with use of fire and herbicides	- 0 287 MCF/Acre
Loblolly without	- 0 189 MCF/Acre
Shortleaf with use of fire and herbicides	- 0 264 MCF/Acre
Shortleaf without	0 174 MCF/Acre
For RCW thinning prescriptions	0 00 MCF/Acre

Letter: 1603 Texas forest plan used the same price trends it did in the 1987 plan. There have been important policy and economic changes in the timber economy since then. The 1993 RPA Assessment contains price trends that capture the impact of some of these changes. Incorporate these updated price trends.

Response. Concern over land and resource capability and sustainability has contributed to the debate over centralized, top-down planning versus decentralized, forest-based, bottom-up planning. Resource capability information developed at the local level was intended to provide the foundation for RPA planning, at the same time, national objectives are essential to strategic planning and setting longterm goals. Binding targets set at the National level in past RPA Programs have resulted in a concentration on timber outputs, at the expense of considering other outputs and conditions. National analyses are likely to overestimate productive potential, because site-specific resource interactions are necessarily lost in aggregating data. We looked at those as guidance and flexible goals. By maintaining the 1987 FLRMP's price trends, we were able to compare the results with the 1987 Benchmarks. See Appendix B, Model Perimeters for discussion on price trends.

Letter: 1603 Economic analysis and employment impact analysis continue to be weak. Tables showing job changes should be expanded to address the changes by economic sector. The economic value of forestry jobs compared with other jobs, such as recreation, to enlighten the decision maker and the public on the inter-dependency of manufacturing and service industries.

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Response: Economic considerations enter NF planning primarily as concerns for the balance among resource values, about management efficiency, and impacts of NF management on communities. RPA and NFMA clearly indicate that efficiency is an important consideration but not the principle criterion for management decisions. The FS used computer models - FORPLAN and IMPLAN. FORPLAN was used to analyze investments, current and future benefits and costs and compared by calculating the present net value of the investment. FORPLAN is a useful tool for examining the efficiency of management alternatives, but has limitation because many uses and outputs of the NF that are not marketed. And those values outlined through existing techniques for unmarketed uses and outputs might not have values that readily compare to market prices. Furthermore, nonuse values of the forest (option, bequest, and existence values) can only be included as constraints on uses and outputs. IMPLAN used the outputs from FORPLAN to identify the economic impact of management alternatives. IMPLAN estimates the employment and income by industry sector for multicounty areas around each NF. The FS has no ability to influence demand factors, which are important to stable industry production. Abrupt changes in the FS can be disruptive. The FS has defined its responsibility to communities as attempting to avoid causing radical or abrupt shifts in local social and economic patterns.

Letter: 1603 The DEIS could be improved by adding historical outputs. The no-action alt is used as a basis for comparing proposed plans to historic plans, the no-action alt, has been modified to reflect the current direction of the District Court. It no longer represents the Forest previous forest plan decisions or accomplishments. The final EIS should include an additional alternative incorporating the 1987 plan with the 1985 RCW guidelines.

Response: In response to issues identified during the scoping process, 9 alternatives were developed and analyzed. This was determined to be adequate.

Letter: 1603 The DEIS is misleading with respect to rotation ages. The actual rotation ages are quite a bit longer. According to FORPLAN solution, loblolly in MA 1 will be harvested at ages 100-120, not the 70 yrs. Shortleaf is harvested at ages 100-120 not the 80 yrs.

Letter: 1603 The draft EIS may mislead some readers about future forest conditions. Clearly, the forest will be much older than implied by the DEIS.

Response: In the short term there will be stands carried beyond rotation age because of unequal age distribution and the limits on the amount that can be harvested each period. Especially with the large percentage of acres being managed by prescription other than even-age.

Alt 4B Age/Existing Loblolly Age/Harvest

70-11,253 110-41,584

80-19,207 120-19,290

90- 708 130- 694

100-22,610 140-12,662

Acres of Existing Longleaf at Harvest

110 - 164 Acres

120 - 135 Acres

130 - 5,332 Acres

150 - 53 Acres

Acres of Existing Shortleaf at Harvest

70 - 3,490 120 - 20,973

80 - 4,252 130 - 748

90 - 10,422 140 - 3,240

100 - 14,695 150 - 5,614

110 - 15,831

Letter: 1603 The Forest may have over-constrained the timber harvest schedule because it did not analyze the actual harvest age. The decision to require 44% of the MA 1 acres to all-ages management is unnecessary. Benefits from the all-aged prescriptions will be provided by the long even-aged rotations. Had the planning analysis displayed actual rather than minimum rotations, the constraint would have been unnecessary.

Response: This has been adjusted to 30% based on VQO classification other than modified plus 5%.

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Letter: 1603 The Council is concerned that by not looking at the actual rotations, the DEIS may be underestimating the forest health problem inherent to Alt 4b Over 60% of the loblolly managed under even-aged prescription, , will not be harvested until sometime after age 100 The Council believes that this is a prescription for disaster

Response: Some 74,230 acres of loblolly will be carried beyond age of 100 in Alternative 4B

Letter: 1603 recalculate the ASQ for every alt using this approach, to demonstrate the FORPLAN's economic assumptions are not overriding the forest's ability to produce sustainable timber outputs

Response: Analyst did this on the draft FP's selected Alternative 4b The resulting ASQ was the same This reflects that maximum timber and maximum PNV benchmark were approximately the same.

Letter: 1603 The DEIS rollover was only done on the benchmarks and not for the forest plan alternatives The Council has raised this issue of procedure in other forests all forests should be consistent with regard to normal procedures, (e g maximizing first decade harvest)

Response: Analyst did this on the draft FLRMP's selected Alternative (4B) The resulting ASQ was the same This reflects that max timber and max PNV benchmark were approximately the same

Letter: 1604 The DEIS fails to discuss adequately (if at all) what measures the Forest Service may have taken or may plan in compliance with the legal requirement to protect soil, watershed, wildlife, fisheries, aesthetics, and forest productivity NFMA Sec 1604 (g) (3) (F) (v)

Response: See Appendix B of the DEIS constraints and the Monitoring Summary Table, Appendix C of the Draft Plan

Letter: 1310 There is no explanation of the large difference in SMZ acreage between the 1987 Plan and the current Draft Plan

Letter: 1605 There is no explanation of the large difference in SMZ acreage between the 1987 Plan and the current Draft Plan

Response: The riparian and wetland acres, floodplain soil with a hardwood forest type, that were not previously included in the SMZ (#4) were moved to that MA This was a movement of 12,972 acres from MA 1 and 3,240 acres from MA 2

Letter: 1679 The Draft FP does not address the concept of producing a forest crop in perpetuity

Response: See Appendix B, FORPLAN analysis constraints The constraints for LTSY and non declining yield ensured that the total forest inventory volume left at the end of the planning horizon (150 years) is sufficient to maintain the harvest pattern Harvested volume does not exceed growth

Letter: 1679 The EIS does not offer scientific research or documentation to explain how you are able to cut so much timber without damaging watersheds, wildlife food sources, habitat, and sensitive species, fisheries, aesthetics, and forest productivity

Letter: 1679 This Draft FP obviously came out of the FORPLAN program What data was fed into the program You did not document that you did the inventories required by NFMA How do we know that the data is correct How do you know that the data is correct?

Letter: 1679 There is no analysis of aggregate effects of management alternatives

Letter: 1679 The Draft FP does not adequately address the current costs and future benefits

Response: See Appendix B for analysis

Letter: 1679 The Draft FP cost/benefit analysis is warped The FS assumes increased water yields are a benefit The DFP does not insure that trees will not be cut until mature Too often pine trees have been cut early to meet ASQ

Response: Used values per RPA which showed that increased water yields have value See previous table for ages of harvested timber

Letter: 1723 (pg 178 DEIS) I believe that the FS does not manage a significant portion of East Texas forests The FS manages 5% of the total forest

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Response: Though the NFGT comprises a relatively small part of the East Texas timber market, the quality of NFGT market product (primarily saw timber) accounts for a substantial 20-25% of the total Texas sawtimber products

Letter: 1767 Alt 1 designates 52% to timber production while alt 2 and alt 3 each designate 40% but increases payment to counties I do not understand how this is accomplished but payments to counties should be increased if possible A further clarification of your method/plan to achieve the increased dollar volume while decreasing the acreage in timber production in your alt methods alt 2 is appreciated

Response: The difference is based on the direction on acres needed to support RCW 1200-meter circles are HMA concept and the different amount of acres in uneven-age management

Letter: 1605 maps for roadless areas are often imprecise and hard to read For special areas there are no maps or descriptions . except some unnamed dot clusters on some maps in the "Map Package " There is only one full list of special areas fails to show which area will be botanical, scenic, or ecological, or how many acres it might contain Inadequacies in the maps of roadless areas include failure to indicate clear boundaries of the Stark Tract and the proposed 410-acre addition to Winters Bayou, and continuing to indicate in white (private) the areas that the FS has acquired such as Upland Island . and Indian Mounds

Letter: 1723 Another problem is the maps These are very small and confusing You do not have each potential special management area shown in detail so a person can visualize what the area looks like Dots on maps do not tell me what the sensitive areas are, how large they are, and what they represent You can do better than this and need to

Letter: 1838 We found the affected environment to be well described However, the scale of the maps provided with the DBIS to define the management areas and each of the proposed alternatives made it difficult to interpret many of the features within the project area and the proposed improvements We suggest that either the scale of the maps in the FBIS be adjusted to facilitate the identification of natural and proposed features within the project area, or the current maps be further refined and additional relevant features be labeled

Response: The IDT agrees The final revised Plan has been amended to reflect this

Letter: 1436 You are making changes to your old plan and to historical usages of the forest. That is fine and there are good reasons to do so NOWHERE in any of the documents is there an indication of plans for implementing these changes A TRANSITIONAL OR IMPLEMENTING statement or plan should be a part of this document

Response: After the RF selects a preferred alternative, a ROD will be prepared The ROD details the reason for the selection of an alternative and will also document any necessary transitional periods and strategies for implementing the revised FP

Letter: 1460 The map supplement for alt 4B shows that--despite increased overall acreage for RCW mgt compared to alt 1 (present condition)--the draft plan ELIMINATES many RCW colonies from active mgt in the Angelina, Davy Crockett and Sabine NF's! No presently known colony, active or inactive, should be excluded or considered expendable

Response: All active RCW colonies except for those in designated wilderness are in an HMA, which is designated as MA-2 in the revised FP MA-2 incorporates the RCW EIS

Letter: 1632 The plan acknowledges that timber mgt has a disproportionately large effect on overall resource outputs The implementation regs (36 CFR 219.27) related to NFMA (Appendix B, pg 58,) apparently mandates that EAM be used on NF lands I assert that due to the constraints imposed by 36 CFR 219.27, this plan is inherently unable to adequately address the issues and concerns, namely: biodiversity, vegetation manipulation, special management areas, wildlife and fisheries, resource sustainability and mix of goods and services My NF experiences have exposed instances where past EAM has failed to adequately protect and sustain soil and water quality, biodiversity, old growth, wildlife and fisheries, and natural integrity of Special Management Areas

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Response: 36 CFR 219.27 spells out some management requirements when even-aged management is used. The choice of a silvicultural system and its associated harvest method is based on a site-specific analysis and documented on NEPA requirements. Standards and Guidelines are in effect to mitigate negative impacts. Most problems occur when the S & G's are not implemented.

Letter: 1632 Notably lacking in the plan is methodology for less impactful, incremental restoration on a per stand basis. Small group selection. Additionally, the plan fails to clearly quantify actual targets for even and uneven-aged acreage.

Response: No silvicultural system nor one of its related harvest methods is prohibited in the revised FP. Harvest methods are based on a site-specific analysis and designed to meet the site's DFC. The environmental impacts are documented in a site specific EA which is available for public review.

Letter: 1723 (pg 234 DEIS) CRQ has regulations and not guidelines. CRQ used to have guidelines but modified and changed these in approximately 1979 into actual regulations. So these are not discretionary but are mandatory for agencies to follow.

Letter: 1723 (pg 33 DEIS) you say Alt 6 will not allow any ORV use in the forests. But on page 26 you say "ORV use is limited to the current existing system of designated trails". Then on page 34 you say that there are 40 miles of ORV trails when in reality for Alt 6 the present PMT's are 55 miles in length on SHNF. Then on page 36 you say there are zero miles of trails for Alt 6. You are confused yourself.

Response: Thank you for bringing this to our attention. The final EIS has been changed to reflect better consistency.

Letter: 1723 (pg 6, DEIS) it is never explained what the "potential for overuse" is and how this will be monitored and what will occur if such overuse is discovered.

Response:
This discussion is found in detail in the 1992 AMS.

Letter: 1723 (pg 49, DEIS) there is an overall conflict between hunting and all other forest uses. I request that the FS have certain areas designated during hunting season as being off limits to hunting to provide safe havens for other forest uses.

Response: A decision to limit hunting or to restrict hunting areas is an administrative decision, not a FP decision.

Letter: 1723 (pg 111 DEIS) I want an alternative that has all candidates for RNA designated so that the impacts of this alternative and the benefits are fully laid out on the table.

Response: All areas recommended for RNA status by the review committee have been assigned to MA-8a, Research Natural Areas, in this revision.

Letter: 1723 (pg 198-199 DEIS) environmentalists never asked that all trails for ORV use, including the PMT's be closed down so why do you propose this in Alt 6?

Response: Elimination of ORV use from the NFGT was proposed by some respondents. This alternative was developed in response to this issue.

Letter: 1723 your personnel have solicited on 11-30-94 ORV users to write in and ask that Boykin Springs not be shutdown from ORV use when the ROD is made and signed. The FS is encouraging the longer use of a sensitive area by ORV's which are destroying part of the sensitive area.

Response: We disagree with your accusation. Everyone with an interest in the management of the NFGT is encouraged to write.

Letter: 1723 this document has only one set of S & Gs to look at, the preferred alternative 4b. There are no other S & Gs for implementing very different alternatives (7 others). This makes it impossible for the public to compare what the impacts will be with different S & Gs. I believe this is contrary to NEPA and CRQ regulations which require a hard look at the impacts and requires comparisons that are clear between alternatives.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Response: Nine alternatives were formulated in order to provide the "broad range" requested by the public and the Chief of the FS. But publishing and distributing a plan-version of each would be too costly. We are not required to choose and publish a preferred alternative in the draft documents. However, with the ongoing and successful involvement of the public in the formulation of the alternatives, we felt the time was right to begin to choose a direction and yet remain open to public and agency comment.

Letter: 1723 (pg 48 DEIS) I disagree that Alt 4b is the best for small game. Natural disturbance will occur in Alt 6 & 7 and will allow small game to make it. In addition, the old growth conditions will provide more habitat for gray squirrels and deer will be kept within their carrying capacity. Also, swamp rabbits will do well in Alt 6 & 7. The disturbance and early successional habitat on adjacent private lands is ignored. In no place in this DEIS and IRRP are cumulative impacts on and off forest looked at.

Response: Overall benefits to small game show a better response in alts 1-5 than in alts 6&7. More species were evaluated than what you refer to.

Letter: 1605 The EA has not discussed how the cumulative effects of harvesting timber in roadless areas will affect recreational use in wilderness areas constituting a violation of 40 CFR 1502.16, 1508.7.

Letter: 1723 (pg 16 DEIS) Also, the cumulative impacts of SPB logging plus every other form of logging are not given (for alt 1).

Letter: 1838 Limited discussions on cumulative impacts for some resources are scattered throughout the document. A summary of all cumulative impacts listed by affected resources could be presented separately for the benefit of readers.

Response: It is important to understand that there are two levels of decision making in the FS. The FP represents only the first level of decision making about the management of the NPGT. Site-specific, project planning to implement the goals and objectives of the FP is the second level of decision making. "Cumulative impact" is the "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions." (40 CFR 1508.7). Cumulative impacts are among the effects (40 CFR 1508.8) that must be included in considering the environmental consequences of actions (40 CFR 1502.16). The "action" represented by a FP is the selection of a programmatic framework to guide future decision making on the forest, using FP management direction as a gateway to compliance with environmental laws at the project and activity level. A FP is not an aggregation of 10 to 15 years of individual project decisions. The EIS for a FP is, therefore, programmatic in nature. Compliance with NEPA is required at the point of an "irreversible and irretrievable commitment of resources." In most cases, this commitment takes place at the specific project/activity decision point. Therefore, the EIS for a FP commonly does not contain site-specific data or disclose site-specific environmental effects, project alternatives, or the cumulative effects of individual projects/activities that have not yet been scheduled.

Letter: 1310 The DEIS classifies the wilderness areas as primitive ROS, but this does not meet the definition as given in the glossary, since there is no place in any wilderness three miles from a road (and I don't mean closed roads within the wilderness). As the AMS of 1992 suggests, this should be recognized and acreage available for primitive recreation should be listed honestly as zero.

Response: Definition under physical location identifies primitive as 3 or more miles from a road. The social and managerial definition of primitive identifies the number of contacts with others and the managerial identifies how we would manage an area as primitive. Wilderness is assigned the primitive ROS primarily because of the Social and Managerial elements.

Letter: 1310 Why doesn't the DEIS use a standard definition of ROS categories? It seems reasonable to me that primitive or semi-primitive non-motorized should mean the same in Texas as it does in Montana.

Response: We are not aware of what the definition of primitive and semi-primitive are in the Montana FP. The definitions in the TX DEIS are out of the ROS handbook.

Letter: 1600 Both the Plan Summary and the main body of the Draft Land Use Plan state that the Angelina and Sam Houston Forests will build 250 miles of trail. Only in Appendix B does the truth come out that the southern Angelina will be limited to 50 miles of trails. A citizen reading only the Plan Summary would assume that each Forest would build 125 trail miles. Such a citizen may have submitted very different comments had he known the truth.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-1

Adequacy of the Revision(alts, issues, format, analysis)

Response: The plan summary can not provide detailed information. The FP is written to provide direction to the district personnel to manage the resources on the ground.

Letter: 1723 (pg 64, DEIS) I am against chopping, shearing, scarifying, ripping, piling, raking, bedding, disking, and herbiciding for site preparation. You do not give all the environmental impacts of these uses on soil microbes, fungi, salamanders, and other creatures as well as soil erosion, compaction, rutting, water pollution, and other environmental damage. The EIS for Vegetation Management is obsolete because it ignores the impacts on salamanders, fungi, soil microbes, and other effects that these activities have.

Response: The DEIS states "The environmental effects of these site prep methods are fully documented in the FEIS for Vegetative Mgmt. in the Coastal Plain/Piedmont (1989), on p. 64. The Veg. Mgmt. FEIS addresses the impacts to soil biota, reptiles, invertebrates, amphibians & aquatic invertebrates (see VM FEIS chapter IV & App. A), as well as vertebrate species. While the env. impacts of chopping, shearing, scarifying, ripping, piling, raking, bedding, listing, and herbiciding for site prep have not been exhaustively researched, we have inferred from the research that has been completed that the env. impacts to soil microbes, fungi, etc., will not be significant."

Letter: 1838 We recommend that a summarization of the control actions and standards specified in the 1987 Southern Pine Beetle Control EIS be provided in the FEIS for the benefit of readers. We found too much emphasis in the DEIS on the incorporation by reference to the other three regional programmatic documents (the SPB, Veg. Mgmt., and RCW EISs) without the benefit of discussing decisions made as a result of these environmental analyses.

Response: Standards derived from the SPB EIS are noted in the FP. The SPB EIS is widely available, and its length and detail make it appropriate for incorporation by reference.

Letter: 1723 The Forest Plan must determine how many acres can be drilled. Yet you are essentially saying, "that all acres can be drilled" there is no environmental analysis to back up such a broad claim of environmental insignificance.

Response: Only mineral leasing availability is determined in the plan. Where to drill is a site-specific decision.

Letter: 1679 Who wrote each part of the EIS and Draft FP? What are the credentials including training and experience of the members of your interdisciplinary team?

Response: See Chapter IV of the EIS.

Letter: 1310 The Draft Plan does not respond sufficiently to the demands of the public for major reforms. It is still 90 percent business-as-usual.

Response: The EIS addresses all significant issues raised during scoping. The IDT is not clear as to what this comment refers to.

Letter: 1723 (pg 45 DEIS) it says that uneven age management will produce a minimal amount of early successional habitat but on page 30 you show it will produce 15,000-28,000 acres by period 1. In addition you never talk about the excess of even age habitat that exists on private lands that are adjacent or nearby NF lands. You need to show the landscape perspective also. Also by period 5, 0-15 yrs. of early successional habitat will be on 371,000 acres of NF for Alt. 6 & 7. This does not seem minimal to me.

Response: This table reflects Forplan outputs. Alt. 6 was modeled with 10% EAM & the Forplan model chose to take the majority of EAM during the first period.

Letter: 1723 (pg 85 DEIS) why is there only one alternative with the court-ordered RCW plan? Since this plan has helped slow the decline of the RCW why do you ignore how it has helped?

Response: The court-ordered plan for the Mgmt. of the RCW in Texas was determined "to likely jeopardize the continued existence of the RCW" in a biological opinion issued by the FWS. For this reason, only the current situation, Alt. 1, used this strategy.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Letter: 1723 (pg 85 DEIS) In addition no other alternative has specific linkages Since this is required by the RCW DEIS why would you ignore this and saddle some alternatives with a lack of requirements that will be court required?

Response: The RCW EIS does not require linkages between HMA's

Letter: 1723 you do not study appropriate alts but you must study "all reasonable alts " as required by CEQ regulations

Letter: 1723 it is important for the FS to use the right terminology from CEQ regulations. It is not a "reasonable range of alternatives" that CEQ talks about but "all reasonable alternatives " In my mind this is very different from a "broad range of reasonable alternatives."

Response: The CEQ regulations state that an EIS "shall provide full & fair discussion of significant environmental impacts & shall inform decisionmakers & the public of the reasonable alts which would avoid or minimize adverse impacts or enhance the quality of the human environment Agencies shall focus on significant environmental issues & alts & shall reduce paperwork & the accumulation of extraneous background data " (40 CFR 1502.1) The CEQ regulations also require that "The range of alts discussed in environmental impact statements shall encompass those to be considered by the ultimate agency decisionmaker. (40 CFR 1502 (e)). Agencies must also "Rigorously explore & objectively evaluate all reasonable alts , & for alts which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated FS regs that incorporate & implement these CEQ regs into the NF System Land & Resource Mgmt Planning are found in 36 CFR 219. Among these requirements is a provision to "formulate a broad range of reasonable alts according to NEPA procedures The primary goal in formulating alts , besides complying with NEPA procedures, is to provide an adequate basis for identifying the alt that comes nearest to maximizing net public benefits, consistent with the resource integration & mgmt requirements of 219.13 - 219.27 Alts shall be distributed between the minimum resource potential & the maximum resource potential to reflect to the extent practicable the full range of major commodity & environmental resource uses & values that could be produced from the forest Alts shall reflect a range of resource outputs & expenditure levels (36 CFR 219.12 (f)) The process that the NFGT used to develop alts is discussed at length in the EIS, Chapter 2, pages 11-14 The alts were developed by an IDT, District Rangers, & their employees, & the Mgmt Team in response to the issues generated through public involvement by individuals, special interest groups, & other agencies The development process has been an ongoing process since then & until the analysis found in this document was completed (EIS, Chapter 1, page 9) While the number of alts that could be developed & analyzed for an area as large & diverse as the NFGT is infinitesimal, a reasonable range of alts was explored to meet the CEQ & FS Planning regulations

Letter: 1723 please explain what the systematic interdisciplinary approach consists of?

Response: The phrase "systematic interdisciplinary approach" comes directly from the NEPA, section 102, where it states that all agencies of the Federal Government shall "utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural & social sciences & the environmental design arts in planning & in decisionmaking which may have an impact on man's environment " The NFMA requires that Forest Plans "be prepared by an IDT (16 USC 1600, sec 6 (f) (3)) The IDT approach for planning is detailed in the NFS LRMP regs, 36 CFR 219.5, which states, in part, that "A team representing several disciplines shall be used for regional & forest planning to insure coordinated planning of the various resources Through interactions among its members, the team shall integrate knowledge of the physical, biological, economic & social sciences, and the environmental design arts in the planning process The team shall consider problems collectively, rather than separating them along disciplinary lines " The same section of the regs continues with a listing of the functions of the IDT as well as guidelines for responsible line officers in appointing IDT members

Letter: 1310 SMZ's need to be discussed as a separate issue. The FEIS needs to fully discuss all facets of this issue

Letter: 1605 SMZ's need to be discussed as a separate issue The FEIS needs to fully discuss all facets of this issue

Response: SMZ's are discussed throughout the FEIS in the Biological, Physical & Social Environments according to standard EIS format

Letter: 1723 (pg 3 DEIS) it is never stated what the Regional Guide is and the constraints set out by the 1990 Resources Planning Act Program What did these documents add to this FP's mandates and how did they constrain it?

Response: The many guidance documents used in the development of the EIS & Plan (including 1990 RPA) are just that, guides These do not establish constraints or mandates

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-1 Adequacy of the Revision(alts, issues, format, analysis)

Letter: 1723 (pg 46 DEIS) special management areas as being negative for the economy because timber or other commodity production is not allowed you do not admit that economic benefits also accrued due to the recreational dollars that are drawn in the local community as people come and visit these beautiful places you do not try to value other benefits that these areas generate You do not give an even handed analysis of economics when it comes to special management areas

Response: All considerations (commodity & non-commodity) are used in the FORPLAN analysis, including estimated influences due to recreation & aesthetic values

Letter: 1723 (pg 11 Plan) how much has each RCW population increased in each forest? According to Warren Starnes at the Trails Workshop on 11-30-94 the RCW populations in the Texas NF have not stopped declining yet

Response: The FEIS details the RCW increase through 1995

Letter: 1679 The Draft FP does not reflect details of monitoring the effects of even-age cuts

Response: Monitoring of objectives & actions to meet objectives is described in Chapter V Details of these monitoring actions are described in Plan App G effects of actions on the biological & physical environment due to timber harvest, both even & uneven aged is described

Issue: 13-2 Public involvement (process & opportunity)

Letter: 1409

I would like to see corporate sponsors for each section of the trail (LSHT) It would be a service project for their company and a group for each section leader to work with

Letter: 1605 Guidelines and requirements to be followed in performing site-specific analyses need to be developed and published in order to ensure completeness and adherence

Letter: 1723 (MA-8a-B2) the public must have full input into management and other decision-making

Letter: 1723 When new trail proposals are initiated various user groups should participate to ensure that trail location will not impact their uses and to help find the best location so that environmental harm is minimized and areas that can take more abuse are chosen for the routes

Response: Comment noted

Letter: 1614 The Draft EIS Summary alludes to a current USFS goal of responding to the demands of the public I find no fault with this premise if a means can be identified that allows FS planners to hear from the public Sierra Club membership is just over 500,000 If you received comments from every single Sierran and an equal number from wise use advocates, you would be hearing from less than 1/2 of 1% of the American public Even if you add all 27 members of TCONR, you still don't have the equivalent of a drop in a bucket Consequently, I implore you to take guesswork, false assumptions, and arrogant presumption out of NF mgmt USFS still has professionals who KNOW how best to manage forests Good mgmt is what you were trained for and is still what the public most needs from you Most of what has been called anti-timber public comment has in fact been elitist babbling from a relative handful of coercive utopians whose ultimate goal is to drive loggers out of American forests

Letter: 1614 On Nov 8, 1994 we heard from the American public The message (public comment) most of us heard was a public desire to return to the basic, down-to-earth, proven standards and values that made America the preferred alternative of immigrants from all over the world If official USFS policy is to accede to the demands of the public respecting forest management than read your orders from Nov 8 and manage our forests according to the best management possible consistent with the silvicultural standards you learned in forestry school and have seen proven in practical application

Response: The IDT appreciates your support

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-2

Public involvement (process & opportunity)

Letter: 1605 Regarding proposed new developed and Semi-Primitive recreation sites, no requirements are mentioned for site EIS or public comment

Response: Site specific information will be gathered and provided for public comment when the project is funded

Letter: 1723 FW-023 - you are cutting out the public by not allowing them to participate in developing the guidelines for protected habitat for threatened, endangered, and exemplary plant communities It is standards, not guidelines that are needed so that the FS cannot be so flexible

Response: The IDT relied on documented research & specialist's input in developing this document Review by state & federal agencies with expertise in the area have indicated this is adequate in a programmatic document

Letter: 1632 Relevant to the Plan, the inherent nature of the scoping process at the program and project level does not sufficiently empower the public to influence management direction

Response: The NFGT Planning Team followed the direction in the NFS LRMP regs in 36 CFR 219.6 for inviting public participation in the preparation of the EIS & FLRMP. A number of federal, state & local government agencies, organizations & individuals were contacted & invited to participate in the planning process (for a list of these, see the EIS, chapter V). While these procedures may not be to the liking of everyone, they are the procedures we must follow until they are revised.

Letter: 1723 (pg 229 plan) in other forests some of the interested public are allowed to participate with the interdisciplinary team for site specific projects. Why is this not true with Texas NFs?

Response: The public can participate with interdisciplinary teams (IDT) and attend meetings provided that meeting participation is open to everyone. However, only federal employees can be members of an IDT. This policy is found in the FS NEPA Handbook, FSH 1909.15, sec 12.1 "The team will consist of whatever combination of FS staff & other Federal Government personnel necessary to provide the necessary analytical skills." Continuing in this same section, "Others may aid or support the interdisciplinary team as determined to be necessary by the responsible official. This participation must be consistent with the Federal Advisory Committee Act of 1972 (5 USC 86 stat 770, USDA Dept Reg 1041-1, 11/13/89)." The CEQ regs provide much latitude to the agency & responsible official in determining how to conduct public involvement (see 40 CFR 1506.6). Info on techniques to involve the public in FS planning & decisionmaking is found in the FS Public Participation Handbook, FSH 1609.13.

Letter: 1723 (pg 7 DEIS) for planning the interdisciplinary team needs to have meetings open to the public at times the public can attend. This should occur for both this FP and the site specific interdisciplinary teams that will occur later.

Response: The NFGT Planning Team followed the direction in the NFS LRMP regs in 36 CFR 219.6 for inviting public participation in the preparation of the EIS & FLRMP. A number of federal, state, & local government agencies, organizations, & individuals were contacted & invited to participate in the planning process (for a list of these see the EIS, Chapter V). For site specific projects, the responsible official has considerable latitude in determining how to inform & involve the public provided that the requirements of the Federal Advisory Committee Act of 1972 are met.

Letter: 1723 (pg 4 plan) describe what the process will be for "development, review, and accomplishment of project implementation by public involvement and participation"

Response: The process for public involvement & participation in projects implementing the Revised Plan is discussed in the Plan, Chapter V in the Public Involvement section of the NEPA Project Requirements subheading.

Letter: 1723 (pg 4 summary) the public should have been invited to formulate alternatives also.

Response: Issues & dealing with issues within various alts has been a common thread throughout the planning process.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-3 Research Needs and New Ideas

Letter: 1632 As RCW management progresses, research needs to be done to determine RCW tolerance of a wider range of conditions than is currently being prescribed. RCW management should not be single-species management. This must be quantified in the plan.

Letter: 1648 I am concerned that planning cycles and short rotation ages lead to a short-sighted perspective. "Long term sustained yield" means thinking 500 years ahead at a minimum. As we do not yet have the science to really know how what we do will affect the forest on this scale, all decisions should be aimed at absolute minimum impact on the forest. This perspective will better assure that the forest values we need are truly managed to be sustainable.

Letter: 1679 Grazing research should not be done in research areas. More research natural areas should be created.

Letter: 1723 (pg 31 Plan) the plant inventory is not complete and a lot of species have been added to it since 1990.

Letter: 1723 MA-8d-71 - the responses to these natural and human disturbances nearby must be measured to ensure that you know what impact they are having on the botanical area.

Letter: 1723 you need to establish via a fire history research program what the natural regime, frequency, intensity, and seasonability of fire was for each stand.

Response: Comment noted

Letter: 1632 I recommend the initiation of a biological data base to provide comprehensive and centralized access to information regarding sensitive plant populations, fragile habitat areas (bogs, wetlands, barrens, etc) champion trees, and other biological resources that should be protected. Past degrade of sensitive areas could have been avoided if land managers had prior knowledge of their existence. The data base will also provide for new discoveries and additions. Such comprehensive information is sorely lacking and necessary for adequate protection.

Response: Recommendation noted

Letter: 1679 Research is needed to define wildlife minimum area requirements and establish how fragmentation affects each species.

Letter: 1723 Other research includes the effects of timber cutting and site preparation on salamanders, soil fungi, and soil micro organisms. I have talked to Elaine Ingham of Oregon State University who is doing work on the effects clearcutting and other forest practices have on soil fungi and microbes and she is willing to test soils in the Texas NF.

Letter: 1723 (pg 39 #2 Plan) I am concerned about research that looks at the need for various Forest management practices. The phrase is so subjective that it can mean anything from protecting riparian areas to allowing logging in riparian areas. This is not a good example of developing specific questions that you want answered about a research topic.

Letter: 1723 (pg 19 Plan) you mention several research projects that have been initiated. What are the preliminary results of this ongoing research?

Letter: 1723 It is very distressing to see the research needs that were developed for the 1987 LRMP are not being researched. This is a backlog of research that you are supposed to do, that was put in the last plan, and which you have not carried out.

Letter: 1723 (pg 33 Plan) you fail to mention the research that is ongoing on the Canebrake Rattlesnake and the Louisiana Pine Snake. You need to talk about the management implications of the research to date on these two species.

Letter: 1723 (pg 31 Plan) what are the results to date of the Southern Forest Experiment Station research that was carried out from the list compiled?

Letter: 1723 (pg 19 Plan) public input into research programs is needed. Not just once for the LRMP process but continually throughout the 10 year plan period.

Letter: 1723 (pg 41 DBIS) you need to list the research that has been initiated and finished and the results so that reviewers can see what research has been done and how it has been applied to NF management.

Response: Research information provided in FP chapter III is not intended to detail all projects or all specific aspects of past, present or future research investigations. It is beyond the scope of the FP and EIS to provide this detail.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-3 Research Needs and New Ideas

Letter: 1808 Chapter III, Current Research Needs, 1. Habitat requirement and ecosystem function, p. 36. A review of the current research needs suggests that the science of ecosystems management is relatively new, local ecological classification types have not been completed for the NFs in Texas, and there is a lack of knowledge regarding occurrence and habitat requirements of Federally-listed species. Therefore, standards should be developed (for each management area) which allow amendments in species and habitat management as new information is obtained from species surveys and ecological classification identification.

Response: The IDT agrees. SMS's have been added to the biodiversity section(s) to reflect this.

Letter: 1310 Available research on the use of pheromones and on SMA's has not been incorporated into the Draft Plan. Why should anyone believe that other research identified as needed would be acted on in the future?

Response: FW-075 addresses this issue. Pheromones cannot be operationally used until approved by the EPA.

Letter: 1808 New techniques, using behavioral chemicals, to control SPB infestations are being studied and have been successful. It is recommended that a forest-wide standard and guideline be developed in the Management Plan and in each of the management areas to adopt these new techniques after they are approved and an amendment is made in the EIS for the suppression of the SPB in the southern Region.

Response: That is our intent FW-075 addresses this issue.

Letter: 1723 (pg 39 #5 Plan) .. you need to differentiate that the birds being transferred are pairs of juveniles and not adults.

Response: This is detailed in the RCW EIS which this document incorporates

Letter: 1723 (pg 33 Plan) it is of great concern that management practice guidelines for prescribed fire, riparian area management and other wet areas, insect and disease control, wildlife plantings, nest box installations, old growth bottomland hardwood management, snag retention, pine-hardwood management type, pine shelterwood, regulated single-tree selection for uneven-aged stand structure, group selection in upland pine-hardwood habitat, seed-tree management, clearcutting, uneven-aged stand management and natural control area with no activities are not set-up yet. The public needs an opportunity to comment on these. This LRMP must allow this open, public input to occur. How will you do this?

Response: These are project-level decisions which require full compliance with NEPA

Letter: 1671 Whatever management alternative is ultimately selected, this Department strongly encourages options which will allow flexibility in management so that changes can be adopted as new information from the RCS becomes available

Response: The IDT agrees

Issue: 13-4 Alternative Preference/dislike/modification

Issue: 13-4-1 Alternative 1

Issue: 13-4-1-1 Like - Alternative 1

Letter: 857 I support Alternative 1

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-4-1-1 Like - Alternative 1

Letter: 888 At minimum, Alternative #1 should be left in place
Letter: 1320 I am writing concerning the use of the Grasslands I am well satisfied with our current management and would like to continue using it
Letter: 1458 I support open (ORV) use of our National Forest Alternative 1
Letter: 1467 I encourage you to adopt alternative #1 or #2
Letter: 1585 I have read the alternatives and support alt #1
Letter: 1629 My preferred alternative is 1 or 2
Letter: 1642 I support alt #1 of issue #4 of the Land Management Program
Letter: 1643 I support alt #1 of issue #4 of the ORV program
Letter: 1650 I support the ORV plan in alternative one
Letter: 1767 I realize the USFS is under a federal mandate to protect the RCW, I feel that the current plan is adequate Alt 1 would seem to be closer than any of the others but still falls short in several respects

Response: Comment noted

Issue: 13-4-1-2 Dislike - Alternative 1

Issue: 13-4-1-3 Modify - Alternative 1

Issue: 13-4-2 Alternative 2

Issue: 13-4-2-1 Like - Alternative 2

Letter: 1308 I most strongly support alt 2 This alternative costs less to implement than the preferred alternative (4b), it allows for more timber to be harvested (which, of course, will be followed by regeneration), it allows for ample small game habitat, it has the greatest payback to counties, it doesn't call for excessive road construction, and RCW habitat continues to meet court-mandated guidelines
Letter: 1603 The Council supports alternative 2 which emphasized commodity production while providing necessary RCW Habitat as identified in the RCW draft guidelines
Letter: 1614 Although Alt 1 (no change) offers the greatest theoretical harvest volume, the lowest USFS budget requirement and continued coddling of special interest groups, it would be pointless to favor Alt 1 because of the official finding of a "need to change" Therefore, my preferred alternative is Alt 2
Letter: 1618 I prefer Alt #2
Letter: 1627 I favor activities in alt 2 maintain the health and productivity of the forest
Letter: 1634 I prefer alt 2 which emphasizes tree farming while still providing for RCW & other interests
Letter: 1651 I support alt 2 which emphasized commodity production while still providing the minimum RCW Habitat Management area as identified in the RCW EIS
Letter: 1676 , , , I am supporting alt 2 of the alts being reviewed at this time regarding the NF use
Letter: 1677 I would like to endorse alt 2 of the DEIS

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-4-2-1 Like - Alternative 2

Letter: 1755 we support alt 2 This alternative will allow for a considerable larger harvesting of timber, which we hope will cure some of the pine beetle problem

Response: Comment noted

Issue: 13-4-2-2 Dislike - Alternative 2

Letter: 1723 (pg 17-19 DEIS) Alt 2, I am against any emphasis on commodity production since this is against the law and will ensure that RCW will not do well
You allow monocultures to occur here and in the general forest, you allow open riding ORV areas, short rotations, even age management

Response: Comment noted

Issue: 13-4-2-3 Modify - Alternative 2

Issue: 13-4-3 Alternative 3

Issue: 13-4-3-1 Like - Alternative 3

Letter: 1256 I favor Alternative 3 as the first choice and Alternative 4a as a second, but less desirable, choice Among advantages of Alternative 3, in my professional opinion, are. 1) Reduced susceptibility to a major pest, the southern pine beetle , 2) higher production of commodities and payments to counties from scheduled harvests of timber , 3) less need for road reconstruction , 4) reduced costs of management, compared to Alternative 4b, a projected savings of \$1-2 million annually, 5) sufficient habitat to ensure RCW recovery and stability

Letter: 1438 Alt 3 appeals to me because it comes fairly close to a harvest regime that equals the growth of the forest while maintaining RCW habitat at an above minimum level required by law This alternative also appears to provide amenities at a moderate level

Letter: 1733 Overall my choice is alt 3 of the DEIS

Response: Comment noted

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-4-3-2 Dislike - Alternative 3

Letter: 1723 (pg 20-21 DEIS) Alt 3, again this alternative has too much commodity orientation. There must be no open riding ORV areas, rotation ages need to be longer, even age management needs to be abandoned, the RCW needs older trees, mineral drilling needs to be reduced, and grazing must be reduced.

Response: Comment noted

Issue: 13-4-3-3 Modify - Alternative 3

Issue: 13-4-4 Alternative 4

Issue: 13-4-4-1 Like - Alternative 4

Letter: 1723 (pg 21-22 DEIS) Alt 4 maximized RCW management which is really a way to hide maximum timber production and reduce hardwood competition. I am against even age management and want Neblett's Creek, Big Woods, and the Angelina River protected.

Response: Comment noted

Issue: 13-4-4-2 Dislike - Alternative 4

Issue: 13-4-4-3 Modify - Alternative 4

Letter: 652 I support alternative (4b) if the wording were changed to allow the open riding area.

Letter: 1585 Alt #4 would become my first choice if it were reworded to allow the open riding areas to remain open while the additional 200 miles of permanently marked trail are built and added to the existing 50-55 miles of PMT. This would reduce the load on the existing trail system suffering from over usage already.

Response: Comment noted

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-4-5 Alternative 4a

Issue: 13-4-5-1 Like - Alternative 4a

Issue: 13-4-5-2 Dislike - Alternative 4a

Letter: 1723 (pg 21-23 DEIS) Alt 4a, I am against even age management. What does managed as an urban forest mean? You never tell how such forests are different, what special guidelines or standards they have, how their mission differs from the other forests. I oppose open ORV areas and the rotations are too short for RCW and OG areas.

Response: Comment noted

Issue: 13-4-5-3 Modify - Alternative 4a

Letter: 888 Alternative #4, 4a, 4b would be preferable IF the currently designated Open Riding Area (bound generally by Stubblefield Lake Road, FM 1375 and FM 149) is left open until the balance of the proposed 250 miles of designated trail is complete.

Letter: 1619 I prefer alt 4A except must increase SPB suppression, timber harvest should be increased, RCW receiving excessive consideration, Herbicides should be allowed extensively.

Response: Comment noted

Issue: 13-4-6 Alternative 4b

Issue: 13-4-6-1 Like - Alternative 4b

Letter: 990 Alternative 4b seems the best. Please no more land given to Wilderness Areas.

Letter: 991 I concur with the selection of Alternative 4B as the preferred alternative for the longterm management of the National Forests and Grasslands in Texas.

Letter: 1409 the plan should be a balanced plan that does not favor any one group of people. Alt 4B seems to be the most balanced.

Letter: 1436 I agree with your selection of alt 4B as providing the most benefit for everyone involved and at the same time managing the resources of our NF for generations to come.

Letter: 1581 I am pleased with your new Land Management Draft revision. We are looking forward to 250 miles of ORV trails.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-4-6-1

Like - Alternative 4b

Letter: 1763 Overall, the preferred alt presented in the Plan represents an earnest attempt to integrate traditional multiple-use activities with other resource values of the lands in your stewardship In this regard, the Plan shows promise for establishing ecosystem-based management

Letter: 1775 I firmly agree to the preferred alternative 4B

Letter: 1808 We support implementation of the preferred Alt 4b, as it related to RCW management and establishment of RCW HMAs

Letter: 1838 We concur with the USFS's determination that Alternative 4b establishes a fair balance in meeting the economic needs of the various forest and grassland users and local counties, while providing for the protection of RCW and other natural values In addition, this alternative supports the stated objectives of the NFGT Revised Forest Plan

Letter: 1838 EPA rates this proposed action/DEIS as "LO", i e , EPA had "Lack of Objections " Our classification will be published in the Federal Register according to our responsibility under Section 309 of the Clean Air Act, to inform the public of our views on proposed Federal actions

Response Comment noted

Issue: 13-4-6-2

Dislike - Alternative 4b

Letter: 7 I wish to express my opposition to Alternative 4b because It continues the destructive system of even-age logging (clearcutting, seedtree, shelterwood cutting), large group selection ("patch clearcuts") and heavy salvage, The annual Allowable Sale Quantity of 101 6 million board feet is too high, Trails and streams are not adequately protected, Too much emphasis is placed upon commodity production (timber, oil, gas, grazing) at the expense of ecosystem protection (biodiversity, soils, old growth, wildlife)

Letter: 97 I oppose Forest Service Management Plan, (Alternative 4B, Draft EIS)

Letter: 102 I am critical of, and in opposition to, the recent Draft Land & Resource Management Plan because it continues to allow destruction of more trees and land and doesn't adequately protect present trails and streams

Letter: 103 I am not satisfied with Tx Forest Plan which emphasizes even age logging I believe income will be more fairly distributed throughout communities when individual loggers can make independent livings doing single-tree selection

Letter: 200 The proposed policy is appalling A careful review of it reveals that it is nothing more than a continuation of the transformation of Texas' forests into tree plantations

Letter: 222 I have very strong feelings regarding the FS's recent Draft Land and Resources Management Plan (Alternative 4b, Draft EIS) because The board feet amount per year is far too high

Letter: 230 I express my opposition to Alternative 4b, Draft EIS

Letter: 417 I oppose this draft FS plan as it places too much emphasis on timber, oil, gas, and grazing operations at the expense of ecosystem protection (biodiversity, soils, old growth, wildlife) and preservation for the future generations

Letter: 722 Alternative 4B, Draft EIS is heavily weighted towards timber, oil, gas, grazing, etc with inadequate protection for wildlife, biodiversity, old growth, etc We need protected areas as well as industry

Letter: 1257 Alternative 4b is NOT satisfactory because it emphasizes business as usual commodity production is more important than ecosystem protection and recreational use

Letter: 1309 This office believes Alt 4B, the alt preferred by the NFGT does not offer as much protection to areas with a high probability for containing historic properties as do alts 6 and 7

Letter: 1310 I like the proposal to protect more of the forest as special areas However, the balance between protected areas and areas devoted to timber management is still extremely lopsided

Letter: 1310 represents some decrease in ASQ from the prior plan, actually just brings the ASQ in line with current excessive logging

Letter: 1453 There is an excessive emphasis on timber production at the expense of a diversity of more sustainable nonconsumptive uses

Letter: 1600 have led me to support alternative 1 or 2 I feel the Forest Service's preferred alternative 4B is a misguided attempt to regain control of Forest Service policy from the federal courts

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-4-6-2 Dislike - Alternative 4b

Letter: 1603 The Council opposes the preferred Alt 4b Our comments point to the shortfalls of Alt 4b and to specific problems in the planning method used by the forest

Letter: 1605 We find many failings and faults with the preferred alt 4B

Letter: 1631 I regret that you have chosen alt 4B . I do not agree with your opinion that it is the best combination to meet needs for endangered and threatened species, ecosystem integrity, and multiple-resource sustainability Alt 4B continues the destructive system of even-aged logging whereas, selection management should be used for all commercially available national forest land in Texas

Letter: 1634 Alt 4B severely restricts the income producing potential of the timber lands while overemphasizing RCW management I think the birds will survive in a managed & active tree farm

Letter: 1640 Alt 4B allows serious habitat and wildlife disturbance with ORV's going cross country in 1/2 the forest, along with 250 miles of new trails

Letter: 1723 (pg 23-24 DEIS) Alt 4b, I am against the large MA-2 and HMA which includes all of SHNF You will reduce hardwoods too much here I am also against even age management and open ORV areas The rotations are too short for RCW and urban forest is not explained

Letter: 1733 I disagree with 4B as the preferred choice

Letter: 1765 Alt 4B of the DEIS fails to meet the "Multiple-Use" criteria as required by law Further, by your own figures, it does not comply with prudent forest management practices and stewardship of public lands The annual ASQ proposed (101 6 MMBF) exceeds the sustainable board feet yield for this forest by 50% Your proposed rate of cutting cannot protect the natural ecosystem diversity of plants and wildlife communities

Letter: 1801 members will be injured in their enjoyment of the forests if the agency's preferred alt in the draft plan is adopted The preferred alt 4B provides inadequate protection for sensitive natural areas, such as streams, trails and candidate wilderness and special areas It calls for excessive timber production goals and continued reliance on "even-aged" logging, to the detriment of the forests' rich biodiversity and other multiple-uses

Response: Comment noted

Issue: 13-4-6-3 Modify - Alternative 4b

Letter: 233 I am opposed to the new Draft Land and Resources Management Plan (Alternative 4b, Draft EIS) on several points

Letter: 858 Alternative 4B (with the exception of reducing MA-2 to around 30%) is the most fair plan for all interests

Letter: 887 I am in favor of the preferred alt (4b)

Letter: 994 My preferred alternative would be 4b if the wording were changed to "Open Riding Area" (Sam Houston NF) would remain open until the total amount of designated trail is in place and open for use

Letter: 1226 like to go on record as supporting the preferred alternative (4b) with the following changes The open riding area should remain open until the proposed trail additions can be put in place Our existing designated trail system is over used now We need to do everything possible to cut down on the concentrated use of this resource The open riding area must remain open until the designated trail system can be expanded to the proposed plan

Letter: 1281 Alternative 4B seems to be the most acceptable plan, with a few changes Since the LBJ Grasslands is located near the Metroplex, I feel there should be less emphasis on grazing and more emphasis on wildlife management and recreation

Letter: 1599 supports the preferred alternative 4b, with the following change The open riding areas should remain open until the proposed trail additions are established Closing the open areas would only cause heavier use of the existing trail system

Letter: 1629 I could support 4B, if the number of miles were increased to 100 or more If 4B is selected, no old or existing trails should be ceased until the new trail system is in place .

Letter: 1642 I would rather support alt 4B if it were written to keep the Open Riding Area as it currently is until more trail mileage is added to replace it

Letter: 1643 I would rather support alt 4B of the plan if it prevented closure of The Open Riding Area until more mileage is in place

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-4-6-3 Modify - Alternative 4b

Letter: 1650 I would also support alt 4B if the wording was changed so that the Open Riding Area would stay open until the total amount of designated trail is in place. If the Open Riding Area is closed before the designated trails are in place it would create even more use of the existing designated trail. The existing designated trails are multi use trails, not just ORV trails. Since the existing plan went into effect in 1987 there has not been any trail added to the designated trail system.

Letter: 1655 the preferred alt 4B offers a good plan for meeting the multiple use goals of the FS. Before we can fully support, we would like to see the following issues addressed in the plan (letter 1655)

Letter: 1769 We support the preferred alt (4B), although it should be slightly modified.

Letter: 1802 proposed decision seriously conflicts with the social objectives as outlined in the DLRMP (Plan IV-46), "Provide a broad spectrum of dispersed and developed recreation opportunities to accommodate public demands." we urge these revisions: 1) retention of open OHV use in the Angelina NF, 2) Immediate expansion of the designated trail system in the Sam Houston to 200 miles, 3) Recognition and accommodation of Four Wheel Driving as a necessary and valid recreation, 4) Remove discriminatory references to OHV use and treat OHVs on an equal basis with other recreationists.

Response: Comment noted

Letter: 216 Please understand that I appreciate your efforts to manage the forest professionally. Please understand that I propose the continued use of the area (Angelina Forest-Boykin) under an OPEN FOREST concept.

Response: Improperly located trails and overuse of areas accelerate erosion of areas when it rains. Our intent is to properly locate and better manage the ORV use, thereby minimizing resource damage.

Letter: 1281 Units 29, 30 & 75 should be changed from grazing to wildlife management and recreation. We would also like to see these three units, plus unit 34 dedicated as a permanent field trial grounds.

Response:

Grazing emphasis will not preclude wildlife mgmt & field trial activities

Issue: 13-4-7 Alternative 5

Issue: 13-4-7-1 Like - Alternative 5

Issue: 13-4-7-2 Dislike - Alternative 5

Issue: 13-4-7-3 Modify - Alternative 5

Letter: 1723 (pg 24-25 DEIS) Alt 5 rotations are too short but I support additional wilderness and special interest areas and like the deemphasis in oil and gas drilling and grazing.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-4-7-3 Modify - Alternative 5

Response: Comment noted

Issue 13-4-8 Alternative 6

Issue: 13-4-8-1 Like - Alternative 6

Letter: 4 I support their (TCONR) decision on the prevention of clearcutting I still think that the related techniques are more than plenty

Letter. 7 I urge you to implement Alt 6 with these major elements Timber harvest using single-tree selection mgt without herbicides, An ASQ of 62 9 MMBF (including salvage), a sensible compromise between zero-cut, park-like management, and intensive commercial timber mgt, No cutting, except for hazard trees, or burning within 150 ft of designated hiking trails, like the Lone Star Hiking Trail, Four C's Trail, Trail Between the Lakes, and Piney Creek Horse Trail, No cutting or burning inside SMZ's (150 ft from perennial streams, 100 ft from intermittent streams, 75 ft from ephemeral streams), No ORV use off of designated ORV trails Stabilize current trails to stop gullyng and erosion No new ORV trails until current trails are brought up to standard, Protect Longleaf Ridge (30,000 acres) and Big Creek Area (6,000 acres) as special areas, and expand Winter's Bayou Scenic Area to 1700 areas, No leasing of federal minerals in scenic or botanic areas, nor within streamside or trail corridors

Letter: 97 I urge you to implement alternative 6 EIS

Letter: 102 Please re-consider using alt 6-DEIS which has been carefully thought out to protect our woodlands for future generations

Letter: 105 We support Alternative 6, etc

Letter: 114 I am writing to ask you to consider Alternative 6 of the USFS Draft Forest Plan in Texas

Letter: 116 I wish to express my support of the compromise Forest Management Plan (Alternative 6, Draft EIS) This plan protects trails, endangered species and nearby streams This plan also balances jobs and protection of the environment Please consider the plan as a compromise among various interests

Letter: 117 I write you to support Alternative 6 without herbicides

Letter 222 There is a plan that is much better suited for the job that you are empowered to do That plan is Alternative 6, Draft EIS, or the Compromise Forest Management Plan

Letter: 226 Please implement the Compromise Forest management plan (Alt 6, Draft EIS) as a more balanced commercial/ecological plan

Letter. 230 I urge you to implement Alternative 6 of the Draft EIS

Letter: 233 please implement Alternative 6, Draft EIS

Letter: 277 recommend the adoption of the Compromise Forest Management Plan (Alternative 6, EIS)

Letter: 342 This letter is to express my support for Alternative 6 of the Draft Environmental Impact Statement

Letter 343 I urge you to implement Alternative 6

Letter: 368 I suggest Plan 6

Letter: 369 I prefer Plan 6

Letter. 370 Please adopt a plan similar to Alternative 6

Letter. 371 I support plan #6 as endorsed by The Sierra Club of Texas

Letter: 373 I support Alternative #6

Letter: 380 Please adopt EIS Alternative 6 .

Letter. 386 I am strongly convinced that Alternative #6 best reflects the philosophy for ecological management of our national forests

Letter: 389 Please Alt #6.

Letter: 391 The FS joined in the Partners in Flight initiative - please honor that commitment and implement Alter 6, Draft EIS

Letter: 414 I am in favor of the suggested alternate Plan 6, and would strongly recommend that it be adopted

Letter: 427 I strongly concur with placing more emphasis on the long term health of our forest resources and less on short term timber production

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-4-8-1

Lake - Alternative 6

Letter: 503 Please adopt Alternative 6 with these major considerations 1 No herbicides (who determines which plants live or die), 2 Reduced annual sales, 3 No cutting within 300 feet of any stream (high water), 4 No ORV except on existing designated trails, 5 Protect areas of special significance (no cutting), 6 Phase out all grazing, 7 No drilling or mining in or near sensitive areas

Letter: 524 I prefer Alternate 6 of the EIS draft over 4b

Letter: 614 I would like to advocate that you go with the Forest Management Plan (Alternative 6, Draft EIS)

Letter: 648 I respectfully ask that your organization support Alternative 6 in the Draft Forest Plan without herbicides and with Longleaf Ridge National Recreation and Wildlife Area

Letter: 649 I feel the best and only alternative is Alternative #6

Letter: 961 (Alt 4b draft EIS) favors commercial exploitation over ecosystem protection I urge you to implement a compromise Forest Mgmt Plan (Alt 6 draft EIS)

Letter: 983 The only acceptable plan in your DEIS is Alternative 6

Letter: 1160 I favor alternative 6, Draft EIS

Letter: 1218 Our grand children & great children will know we protected a priceless treasure if Alternative 6, Draft EIS is implemented

Letter: 1257 Alternative 6 also makes the forests and grasslands look like I want them to look like in the future, Alternative 6 manages the land in a way that is closest to what I consider good management of the forests and grasslands please use Alternative 6

Letter: 1259 I am in favor of Alternative 6 of the Draft EIS

Letter: 1260 A compromise (Alternative 6) would be good for government and environmental interests

Letter: 1309 Alts 6 & 7 both greatly increase the width of the streamside and bottomland zones that are kept free from timber harvesting Although this management practice is primarily intended to increase biodiversity, it also will serve to protect historic properties, since these zones have the highest potential for containing archeological sites

Letter: 1309 Alts 6 & 7 both have the greatest number of Special Management Areas where impacts of all kinds, including those from recreation, are strictly controlled Again, by removing more areas from potential impacts, historic properties will fare better than under other alts Under the FS/SHPO Heritage Mgt Plan, additional historic mgt areas are proposed, which we believe should be considered to enhance cultural resource protection on the forests

Letter: 1309 In our opinion, alt 6, which prohibits all ORV use, offers the best protection for cultural resources ORVs used in an off-trail setting during wet conditions can create serious ruts which damage shallow archeological deposits Alt 7, which eliminates open use of ORVs and confines such use to a trail system may be a more realistic compromise, since people who own ORVs are going to go somewhere to use them At least there is some degree of control of their use under alt 7

Letter: 1310 The ASQ and the land allocations are a better balance between commodity production and ecosystem protection and quality recreation

Letter: 1313 Why is the FS proposing in the Draft Plan a continuation of this destructive system of even-aged logging and salvage? Perhaps the answer lies in the projected annual Allowable Sale Quantity of 101.6 million board feet This projection is too high, unsustainable, and simply poor management Alternative 6 of the Draft Environmental Impact Statement (Draft EIS) offers a compromise between a no-cut management, national park management, and your intensive commercial timber management

Letter: 1385 Alternative 6 represents the best compromise between commodity production and non-consumptive use

Letter: 1433 I believe the new Forest management plan should be alternative 6 in the (DEIS)

Letter: 1454 May you deem the alternative 6, draft EIS to be a viable compromise (to Alt 4B)

Letter: 1463 I urge you to adopt alt 6, which is much more sympathetic to the needs of wildlife and the general visiting public

Letter: 1465 I urge you to adopt Alternative 6

Letter: 1567 Support Alternative 6 of the Draft EIS

Letter: 1597 Please support alternative 6

Letter: 1622 I recommend alt 6 over the other proposed alts

Letter: 1623 I urge you to support Alt 6 of Draft EIS

Letter: 1625 After considering all the alternatives in the EIS and reading all the information you have sent me - the alternative number six (6) closest fits my concerns for the future of our forests These great lands must be preserved for all - not exploited for the profit of the few

Letter: 1633 My overall comment would be to implement alt 6

Letter: 1640 I am opposed to the FS's alt 4B and urge you to implement alt 6

Letter: 1640 Alt 6 with no leasing in wilderness, scenic or biologic areas and elsewhere, not to be within 150' of streams or trails is recommended

Letter: 1640 Alt 6 is superior to alt 4B since alt 6 supports wildlife habitat quality and quantity by having over 2 times as many wilderness areas, research natural areas, wild and scenic areas and 2 more riparian/wildlife areas

Letter: 1640 Wildlife will have more nesting cavities, mast cover with alt 6

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-4-8-1 Like - Alternative 6

Letter: 1658 Adopt alternate 6 of the DEIS, which I support
Letter: 1723 (pg 26-27 DEIS) Alt 6, I agree with uneven age management and like that there is no herbicide use I agree with the wilderness and special interest areas designations and agree to limiting ORV use I agree with limiting mineral extraction
Letter: 1723 the alt looks good and if you gave it a fair chance and were not so biased then it would be even a better alt than it is I object to your bias
Letter: 1776 I favor alt 6

Response Comment noted

Issue: 13-4-8-2 Dislike - Alternative 6

Issue: 13-4-8-3 Modify - Alternative 6

Letter: 51 1) Allowable sale quantity 62 9 million feet 2) No disturbance of streams 3) LIMIT ORV ACCESS 4) Protect Longleaf Ridge & Big Creek Area 5) Limit oil co's abuses 6) Make timber co's pay for the roads and timber
Letter: 58 Let's stop damaging the forest by cutting it down, spraying with herbicides, putting in stock animals which don't belong in a forest, driving 3 wheelers where they don't belong Let's leave it alone so we can see, feel and hear the forest for what it is

Letter: 81 Streams need additional protection
Letter: 349 I am writing in support of a forest management plan modeled after alt 6 of the DEIS The following should be implemented restricted cutting along designated hiking trails for 200 feet, no cutting and burning within 100 to 150 feet of streams, no further expansion of ORV trails but instead repair existing trails, no federal leasing in sensitive scenic or botanical areas of minerals and expand Winter's Bayou Scenic Area
Letter: 364 I am very much opposed to your management plan your plan promotes production rather than protecting and maintaining our forests for future generations I suggest no more than 50 million board feet annually
Letter: 366 I firmly support Alternative 6, but I do support prescribed burning
Letter: 387 support Alternative #6 for the most part however, I would NOT support NO oil & gas exploration but keep it out of wilderness, stream corridors, etc I would urge that SMZ's be increased to 150 feet at least - with additional width for ephemeral and intermittent streams
Letter: 415 I would suggest no ORV use off designated ORV trails, no cutting except hazardous trees or burning within 150' of designated trails, timber harvest by single tree selection
Letter: 700 We don't want to see and smell herbicides, clearcutting, erosion and burning'
Letter: 1166 I urge you to implement alternative 6, Draft EIS with two major changes 1) designate Longleaf Ridge as a Recreational and Wildlife area instead of as a wilderness
Letter: 1228 I would like to see 2 Streamside mgmt zone- no prescribed burning 3 Hiking trails- no relocating trails for logging purposes, no prescribed burning, no pine beetle cuts, 150 ft corridor on each side of trail, 4 Off Road Vehicles- keep them on ORV trails a user fee could be used to get funds for these trails maintenance, 5 Southern Pine Beetles- no cutting at all in wilderness areas, streamside or trail areas, 6 Special Use Areas- increase Big Creek Scenic Area to 6000 acres, name Longleaf Ridge in Angelina NF as National Wildlife Recreation and Conservation Area
Letter: 1258 Alternative Number Six (6) of the Draft Revised Land and Resources Management Plan, with some modifications, seems best suited for that objective
Letter: 1310 I'd like to register my support for alt 6 with two changes one, that 24,000 to 30,000 acres of national forest land in the Longleaf Ridge area be designated a Conservation, Wildlife and Recreation area, and two, that federal oil and gas may be leased, except in wilderness, scenic, botanical and other special areas, with surface use stipulations forbidding occupancy within SMZ's and trail corridors

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-4-8-3 Modify - Alternative 6

- Letter:** 1435 Several of the plans have good and poor features. For example, plan 6 recommends selection cutting which is good, but prohibits mining which, if done properly, can be a viable part of the management plan.
- Letter:** 1440 I urge you to implement alternative 6 (DEIS), with two major changes: 1) Designate Longleaf Ridge as a Recreational and Wildlife area; 2) Leasing of Federal minerals is acceptable except in wilderness, scenic or botanic areas, or within streamside and trail corridors.
- Letter:** 1575 I support alternative 6 of the DEIS.
- Letter:** 1605 We strongly support alt 6, with some changes, to wit, that Longleaf Ridge be designated a Conservation, Wildlife, and Recreation Area, and that federally owned minerals could be leased, except in wilderness or any type of special area.
- Letter:** 1616 I support alternative #6 with 2 exceptions: Exclude herbicide use and make Longleaf Ridge a National Recreation and Wildlife area instead of a wilderness area.
- Letter:** 1617 I support alternative 6 with two exceptions: Exclude the use of herbicides, and make Longleaf Ridge a National Recreation and Wildlife Area instead of a wilderness area.
- Letter:** 1626 The plan that comes closest to my vision for how the National Forests in Texas should be managed is alt 6. However, this alt should be altered to allow the following: Some use of controlled burning and limited mineral activity.
- Letter:** 1667 A straw poll taken at my work place yielded uniform support of (alt 6). A balanced approach, erring if necessary on the side of protection, was favored.
- Letter:** 1765 Alt 6 of the DEIS is the preferred RESPONSIBLE option. It should be modified to make the Longleaf Ridge and Big Creek areas, "Recreation" and/or "Conservation" areas and not be given "Wilderness" designation.

Response: Comment noted

Issue: 13-4-9 Alternative 7

Issue: 13-4-9-1 Like - Alternative 7

- Letter:** 959 I recommend that Management Area Alternative 7 be adopted by NFGT for the final LRMP, it provides a reasonable mix of timbering, grassland management, recreation, as well as the preservation and protection of streamside zones, wilderness areas, and special areas.
- Letter:** 1723 (pg 27-28 DEIS) Alt 7, I am against herbicide use and I like the use of some prescribed fire. I like limiting ORV use to current trails and reduced mineral development.

Response: Comment noted

Issue: 13-4-9-2 Dislike - Alternative 7

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue 13-4-9-3 Modify - Alternative 7

Issue: 13-5 Goals Preference/dislike/modification

Letter: 1723 (pg 46 Plan) the FS needs a manual with pictures of all the sensitive plants and animals so that FS personnel, other resource agency personnel, and individuals interested in sensitive species protection can help find where these species are in the forest and assist the FS in protecting them

Response Given sufficient funds, this might be accomplished

Letter: 52 Please set aside OUR forests for protection as natural areas and recreational use

Response: One of the purposes of the FS is to supply timber NF are managed for renewable and non-renewable resources which include " but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values without impairment of the productivity of the land "(FLPMA Section 103 (c)) National parks and monuments were created to preserve There is no commodity production in a National Park The NFGT are part of the FS, not the NPS

Letter: 1453 there is no alternative materials discussion in proposals for the RNA or the SFA Experimental Forest, nor in the section regarding Planning I see no mention of research or development on such paper pulp options as kenaf or hemp or sisal or cotton , nor on construction alternatives such as minimill steel framing, flyash concrete, rammed earth, caliche products, and so on

Response: Research information provided in FP chapter III is not intended to detail all projects or all specific aspects of past, present or future research investigations It is beyond the scope of the FP and EIS to provide this detail

Letter 1723 (pg 42 plan) actually does make some site specific decisions It decides if there is to be more wilderness candidates and where they are, it decides where special management areas will be, where research natural areas will be, where campgrounds will be, where wild and scenic and recreation rivers will be, where timbering is allowed, There are alot of site specific decisions including how land will be classed as LTA's under the ECS It is very odd that no site specific decision since the 1987 plan was approved has ever had an EIS done on it This seems contrary to NEPA and CEQ regulations sustainability"

Response: The revised FP is a programmatic document that sets direction for implementing the preferred alternative The decisions to be made in this revision can be found in Chapter 1 of the EIS

Letter: 1723 need to define naturally diverse and "long-term sustainability"

Response Natural diversity is best defined through the many elements & criteria in the ECS, sustainability of the FP exceeds 150 years

Issue 13-6 Objectives Preference/dislike/modification

Letter. 1723 (pg 48 #k Plan) you must only allow land use on NF lands that does not degrade the NF lands and maintains ecosystems and their processes

Letter 1723 (Pg 46, Plan) the FS recognizes the importance of riparian areas but does not go far enough There should be no logging of these areas for any purpose

Letter: 1808 Chapar IV, Management Objectives, p 48 We recommend adding the following phrase to statement 3(k), " and when Federally-listed threatened and/or endangered species will continue to be protected according to the Endangered Species Act " We also suggest changing the statement 4(d) to read, "Provide high quality pine and hardwood saw-timber and other forest products " Additionally, we question whether or not it will be feasible to supply a continual flow of high quality pine and hardwood products

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-6 Objectives Preference/dislike/modification

Response: Comment noted

Letter: 9 I support this plan with the exception of the lack of detailed descriptions of timber cutting methods

Response: Timber cutting methods are explained in App J of the EIS

Letter: 1723 (pg 52-53 Plan) you do not explain how you derived the downed wood and snag numbers as being sufficient What are they sufficient for? What level of wildlife populations? How do they compare to natural amounts of dead wood?

Response: These estimates are not supported by literature & were dropped from the MIS list

Letter: 1723 (pg 46, LRMP) why are only fire dependent LLP and SLP ecosystems emphasized here?

Response: These communities have the most to gain via restoration, all communities will be restored, but not to the levels of LLP & SLP that exceeds 100,000 acres

Letter. 1723 (pg 52-53 Plan) Nodding Nixie is not just a species of the longleaf pine woodlands you do not have populations for all species like Louisiana Black Bear and other species Slender Wakerobins I have seen are not in dry forests but mesic slopes and woodlands Your vegetation group, dry-mesic and xeric oak-pine forests makes no sense Something cannot be dry and mesic at the same time and cannot be xeric and mesic at the same time

Letter: 1723 (pg 52-53 plan) Bobwhite should not be common to all land areas because it is an upland grasslands bird I believe having Fox Squirrels for all lands also does not make sense I believe that Louisiana Waterthrush is a good indicator for interior forest species This bird should be used as an indicator number of other salamanders could be used because they can indicate the impacts that clearcutting is having on forest dwellers all timber activities could be well monitored by using salamanders

Response: The MIS table has been changed, many changes reflect your concerns

Issue 13-7 Management areas preference/dislike/modification

Letter: 1604 The Draft EIS at 5 arbitrarily limits the red-cockaded woodpecker (RCW) habitat in (Alternative 6 and 7) 212,824 acres, and then would "leave sub-populations isolated between forested areas that are not managed according to RCW EIS standards RCW populations would expand to recovery levels, but probably not beyond that " In contrast, under Alt 4b the RCW habitat (MA-2) would be 338,637 acres (DEIS 85) "RCW population could expand beyond recovery objectives " This forces us to choose between (a) changing Alt 6, (b) accepting the limits therein to RCW expansion, and (c) explaining away the DEIS premise that management according to EIS/RCW standards is better for RCW

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-7 Management areas preference/dislike/modification

Response:

Ten alts were considered in detail in the EIS. Any one could be selected as the preferred only if the RF identifies it as the alt that maximizes net public benefits. Different individual organizations or agencies place different weights on the importance of providing various uses, values, products, & conditions. This fact results in disagreement between these various entities over which alt should be selected as the revised NFGT Plan. Our planning effort was driven by making careful balances between alts of all user needs. This was done in a sensitive manner to reduce conflict, sustain the environment & yet provide the maximization of net public benefits. The RF has identified Alt 8 as the FS preferred alt in the FEIS. This alt was developed to respond to a wider array of uses, values, products, & conditions. Public comments, national & regional policy, all applicable laws such as BSA, Antiquities Act, Clean Water Act, etc., and the analysis of resource opportunities aid the RF in reaching this decision.

Issue: 13-7-1 DFC

Letter: 1723 (pg 16 Summary) I want the driving direction for the grasslands to be restoration to native grassland species. I disapprove of your statement on pg 44 DEIS where you say "These pastures of bermuda or lovegrass are managed to complement native prairie land and increase grazing capacity." What you are saying is that you will not manage by ecosystem management. If you were you would restore the native tall grass prairie and not cultivate exotics that compete and take over from native grasses.

Letter: 1808 Chapter IV, Desired Future Condition, p 45. Language in the DEIS provided for allowing development of oil and gas wells along major travelways. To reflect this in this section of the Management Plan, the statement regarding scenery along major travelways should be revised to read, "Scenery along most of the major travelways, lake shores, and river corridors will develop and maintain a variety of scenic qualities, including some areas with an older-forest character." It is further recommended that a statement in MA-1-62 and MA 2-62 be developed to include that well sites and associated facility locations may be placed in major roadways to reduce forest fragmentation.

Response: Comment noted.

Letter: 1808 Chapter IV, Plan, Desired Future Condition, p 44. While we agree that examples of natural succession on forest and grassland ecosystems will be demonstrated through more areas that are managed for special attributes, we are concerned that these may become the only areas within which ecosystems management will be implemented. The concept of a forestwide ecosystems management plan should be sincerely put into practice.

Response: The FS will use ecosystem management as the means to meet goals specified in the revised FP. Ecosystem management is the means to an end. It is not the end itself. The FS does not manage ecosystems just for the sake of managing them or for some notion of intrinsic ecosystem values. They are managed for specific purposes such as producing, restoring, or sustaining certain ecological conditions, desired resource uses and products, vital environmental services, and aesthetic cultural or spiritual values. For the FS, ecosystem management means to produce desired resource values, uses, products or services in ways that also sustain the diversity and productivity of ecosystems. This is neither product-oriented bias nor a nature-oriented bias. In some places, the emphasis is on ecological conditions and environmental services. In others, it is on resource products and uses. Overall, the mandate is to protect environmental quality while also producing on a sustainable basis, resources that people need.

Letter: 1723 (pg 44) Loblolly Pine usually occurred on the slopes and bottoms and not in the uplands. So why do you want predominantly loblolly in the uplands? Loblolly naturally grew in dense stands so why do you want to manage it as an open forest? areas of potential OG forest need to be identified now so that the public can review your decision on this. define what "older forest character" means. you try to make wilderness sound unattractive saying it grows up into thickets.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-7-1

DFC

Response: Pg 44 describes the DFC for NFGT Loblolly pine is only mentioned in the paragraph that states "Areas of the Forest will generally develop older tree conditions, including bottomland hardwoods, mixed forest uplands and upland pine areas with an open character of longleaf, shortleaf, and loblolly pine stands "

Issue: 13-8

NEPA Process & Procedure

Letter 1723 I am totally against MA-8b-112, where it says that timber can be cut for non-timber goals

Response. Comment noted

Letter: 1723 (pg 139 DEIS) the FS is not taking cumulative effects properly into account either in this EIS or site specific ones You have not done a proper job on cumulative environmental assessment in this DEIS because you have not looked at past, present, and reasonable foreseeable future impacts from oil and gas drilling activities You leave out the past and present such activities on both National Forest and private lands that are adjacent or nearby NF lands Such environmental impact assessment is required under CEQ mandatory regulations

Letter 1723 You ignore the cumulative impact that occur when private minerals are on federal forest land the FS does not do any environmental analysis even though NEPA and CEQ regulations do not exempt the FS from doing environmental analysis by not doing any environmental analysis when private mineral rights on federal lands are involved you eliminate the ability of the FS to mitigate the damage you ignore these individual and cumulative impacts and how you can reduce impacts elsewhere to make up for these impacts

Response. It is important to understand that there are two levels of decision making in the FS The FP represents only the first level of decision making about the management of the NFGT Site-specific, project planning to implement the goals and objectives of the FP is the second level of decision making "Cumulative impact" is the "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions " (40 CFR 1508 7) Cumulative impacts are among the effects (40 CFR 1508 8) that must be included in considering the environmental consequences of actions (40CFR 1502 16) The "action" represented by a FP is the selection of a programmatic framework to guide future decision making on the forest, using FP management direction as a gateway to compliance with environmental laws at the project and activity level A FP is not an aggregation of 10 to 15 years of individual project decisions The EIS for a FP is, therefore, programmatic in nature Compliance with NEPA is required at the point of an "irreversible and irretrievable commitment of resources " In most cases, this commitment takes place at the specific project/activity decision point Therefore, the EIS for a FP commonly does not contain site-specific data or disclose site-specific environmental effects, project alternatives, or the cumulative effects of individual projects/activities that have not yet been scheduled

Letter: 1723 (pg 228 plan) . what guidelines does the Forest have for the determination of clearcutting being the optimum method? You must give these now to guide site specific determinations The same holds true for stand conversions

Response

Under the requirements of NFMA, site-specific analysis and disclosure is needed to support any decision on clearcutting as being "optimum" or other even-aged regeneration methods as being "appropriate" Many of the alternatives limit the use of certain even-aged or uneven-aged regeneration methods where the use of such methods would not achieve the objectives of the management areas within those alternatives

Letter. 1723 I am also concerned that you apparently allow amendments too easily during the project level decisions

Response: Any amendment will follow NEPA procedures

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue 13-8

NEPA Process & Procedure

Letter: 1723 (pg 16, LRMP) demand is different from need You do not talk about alternatives to cutting, like recycling wood or wood substitution Yet NEPA and CEQ regulations require that even alternatives that are not under FS power need to be assessed and requires that all reasonable be looked at

Response: The CEQ regs require agencies to "Include reasonable alternatives not within the jurisdiction of the lead agency" (40 CFR 1502.14 (c)) Various levels of timber harvesting were considered in the alternatives, with annual ASQs ranging from 62.9 MMBF in Alt 6 to 144.5 MMBF in Alt 2 Chapter II of the EIS discusses the alternatives & how they were developed & refined, as well as discussing alternatives that were eliminated from detailed study Obviously, the number of alternatives that could be developed to direct the management of an area as large as the NFGT is infinitely large A range of alternatives was developed to address public comments, issues, & legal requirements

Letter: 1723 (pg 53 DEIS) project by project decisions do not look at cumulative impacts from all past, present, and foreseeable future decisions on FS lands and adjacent private lands Yet this level of environmental analysis is needed if a landscape ecosystem management perspective is to be used

Response: Cumulative impacts of proposed actions & alternatives have been addressed in site specific project EAs As we refine our ecological classification system & ecosystem mgmt procedures, we will be able to better define cumulative impacts of activities on the NFGT

Letter. 1723 problem with site specific environmental analysis is that there has never been, since the 1987 FP was approved, a site specific EIS done on any of the four Texas NFs You must give guidance in the FP when an EIS will be done on a site specific project and cumulative impacts will be looked at in every environmental analysis no matter what the level of analysis

Response: The CEQ regulations provide ample direction for determining when to prepare an EA & when to prepare an EIS (see 40 CFR 1501.3 & 1501.4)

Letter 1723 (pg 8 plan) there is no officially approved plan The 1987 plan was remanded back to be revised and was not approved Therefore, in my view, all decisions that have been tiered to the 1987 FP and DEIS are illegal because the 1987 FP was not approved

Response: The 1987 FLRMP was approved by RF John Alcock on May 20, 1987, as correctly stated in the Revised Plan, chapter II, page 8 The 1987 FLRMP was remanded by the Chief of the FS for re-analysis due to appeals & court orders The Chief's remand letter of April 1, 1989 provided direction for interim mgmt of the NFGT as follows "For those areas within 1,200 meters of active & inactive RCW colonies (approximately one-third of the area of the NF), mgmt will be conducted in accordance with the decision of the Federal District Court & any future court rulings Except as provided below regarding appropriate silvicultural systems, mgmt of the remaining two-thirds of the NFs will be conducted in accordance with the mgmt prescriptions & standards & guidelines contained in the FP approved by the RF on May 20, 1987 "

Letter. 1723 since the 1987 plan .. no cumulative impacts have ever been done for all past, present, and foreseeable future oil and gas and other activities in the forest and no EIS has been done for any activity In addition you do not define "significantly exceed" In other forests EIS's are done when wells are proposed to be drilled Why is this not done in Texas?

Response: Cumulative impacts of proposed actions & alternatives have been addressed in site specific project EAs The EIS Appendix C has an extensive discussion of past, present, & reasonably foreseeable development of oil & gas resources Analysis & decision making guidelines for drilling operations are outlined on page 30 of Appendix C, & guidelines for field development are on page 43 of Appendix C The definition of significance is found in the CEQ regs at section 1508.27, & takes into account both the context & intensity of proposed actions Guidance for determining when to do an EA or an EIS is found in the CEQ regs in sections 1501.3 & 1501.4

Letter. 1808 To date, the USFS has not determined the cumulative impacts of past, present, and future oil and gas exploration and developments on the RCW, the rare plant communities, particularly the LL pine/bluestem community, and on the interior forests in each of the NFs in TX In order to be in compliance with the NEPA, it is recommended that these impacts be determined

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue 13-8

NEPA Process & Procedure

Response: The EIS Appendix C discusses past, present & reasonably foreseeable development of oil & gas resources. Impacts of oil & gas development proposals will be addressed on a site specific basis. A discussion of standard operating procedures for leasable energy minerals is found in EIS Appendix C, pages 33-51. Forest-wide standards & guidelines for mineral resource activities are located in the Revised Plan, Chapter IV, pages 69-71, & include provisions to guide environmental analysis. Also, Mgmt Areas 3,4,5,7,8a, 8b, 8c, 8d, 8f, 9a, 9b, 10a, 10b, & 11 have additional standards & guidelines for mineral activities.

Letter: 1723 large loophole that means major changes can be made under the guise of site specifics Where is the guidance to districts to ensure that this kind of action does not occur?

Response: Project level decisions must adhere to Plan direction. Full review, internal & public review, externally ensure compliance & elimination of perceived loopholes.

Issue 13-9

General

Letter: 1723 (pg 48f plan), minimizing insect and disease loss should not be a goal You should allow insects and disease to play their natural role in the forest.

Response: SPB control is given priority in most management areas in order to protect the pine resource which will help provide for multiple use and lead to sustained yield as mandated in the MUSYA. SPB control is not given high priority in management areas where natural processes are the main focus, such as wilderness.

Letter: 1723 (pg 50 plan) I do not like guidelines because they give too much flexibility.

Letter: 1723 (pg 51 plan) I feel your management area ecosystems are not sufficiently broken down. You need S & G's for each ecotype that you work in down to stand level and even inclusions less than 10 acres in size.

Letter: 1723 MA-8f-92 - make sure that unprogrammed timber harvest is not allowed also.

Letter: 1723 MA-4-111 - I want no timber cutting of any kind for any purpose except for individual hazard trees in imminent danger of falling in an area where the public often is found.

Response: Comment noted.

Letter: 1723 (pg 49 plan) need to define Ecosystem Management here What do you mean by an "ecological approach to management?" Your discussion of EM does not sound like what came out of the Chief's office three years ago. Please explain your views origin and its relationship to what the Chief has said.

Response: The FS will use ecosystem management as the means to meet goals specified in the revised FP. Ecosystem management is the means to an end. It is not the end itself. The FS does not manage ecosystems just for the sake of managing them or for some notion of intrinsic ecosystem values. They are managed for specific purposes such as producing, restoring, or sustaining certain ecological conditions, desired resource uses and products, vital environmental services, and aesthetic cultural or spiritual values. For the FS, ecosystem management means to produce desired resource values, uses, products or services in ways that also sustain the diversity and productivity of ecosystems. This is neither product-oriented bias nor a nature-oriented bias. In some places, the emphasis is on ecological conditions and environmental services. In others, it is on resource products and uses. Overall, the mandate is to protect environmental quality while also producing on a sustainable basis, resources that people need.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-9 General

Letter: 1723 (pg 124) you leave too much to site analysis which never occurs You need standards that spell out that riparian areas are off limits Nothing less is sufficient

Response: The purpose of streamside zones is not to set aside and not manage, it is also not to manage for timber Purpose is for management for wildlife and recreation and to protect streams

Letter: 1723 (pg 10, Plan) scenic areas have not been managed to protect their scenic qualities BCSA has been devastated by SPB cutting you have allowed oil and gas drilling in Winters Bayou

Response: The FS can not stop mineral rights owners from drilling to recover their minerals The SPB cutting in BCSA were done to protect the scenic quality of the rest of BCSA

Letter: 1723 seems that the FS is distorting wilderness values and potentials and ignoring the will of Congress and what Congress has said was sufficient for wilderness in the past

Response: Wilderness management in Texas has been in accordance with the Wilderness Act of 1964

Letter: 1723 (pg 13 DEIS) you state that the ranger districts developed three different strategies There needs to be a summary of what these were and how they differed from each other and what the planning team wanted The public needs to see what the feeling of the FS itself is about this plan

Response: Alternatives 2,3, & 5 were developed by the district

Letter: 1723 (plan pg 85) you ignore the hardwoods on the uplands and have too short rotations You need 200 yrs for Loblolly, 250 yrs for SLP and 300 yrs for LLP and let upland and bottomland hardwoods live as long as possible

Response: The IDT is not aware of any documented research to support this

Letter: 1723 (EIS appendix J), is not even listed in the table of contents

Response: Thank you for bringing this to our attention

Letter: 1723 (pg 48g plan) you do not have a prescribed burning program that mimics natural ecosystem evolution

Response: Lightning fires were only one source of pre-settlement ignition Native american burning is also part of the fire history of these areas The planned burning cycles are part of the overall mgmt intended to produce the DFC's The DFC's provide the diversity required by the NFMA

Letter: 1723 (pg 2 DEIS) maximizing public benefits may not be what you want Can you define this? Is there only one way to maximize public benefits or are there many ways? Which one is best? This is a subjective choice After all many of the benefits cannot be valued in dollars and therefore lose out in a strictly capitalistic totaling of the benefits

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue 13-9

General

Response: A definition of net public benefits is found in the FS Planning regs at 36 CFR 219.3 "An expression used to signify the overall long-term value to the nation of all outputs & positive effects (benefits) less all associated inputs & negative effects (costs) whether they can be quantitatively valued or not. Net public benefits are measured by both quantitative & qualitative criteria rather than a single measure or index. The maximization of net public benefits to be derived from mgmt of units of the NFS is consistent with the principles of multiple use & sustained yield. The Planning regs require "Mgmt direction shall (1) Include requirements for analysis to determine programs that maximize net public benefits, consistent with locally derived information about production capabilities." (36 CFR 219.4(a)). In section 219.12(f) the planning regs also state that "the primary goal in formulating alternatives, besides complying with NEPA procedures, is to provide an adequate basis for identifying the Alt that comes nearest to maximizing net public benefits, consistent with the resource integration & mgmt requirements of sections 219.23 through 219.27." The EIS App B is an extensive description of the analysis process used to evaluate each of the alts including the basic assumptions, modeling components & inputs, rules, methods, & constraints that were used.

Letter: 1723 (pg 49 plan) you do not have ECS completed so how can the public rationally pass judgement on what you will do. You in essence rob the public of input by providing no final product and the opportunity to comment on it.

Response: ECS is a continually developing & improvement effort as more information is gained, clearer identification of ECS components will be described. Numerous state, federal, and university personnel, as well as organizations and individuals have provided information. Your input is also welcome.

Letter: 1605 The documentation of Roadless Areas is inadequate. The EIS does not document the effects of building roads and cutting timber.

Response: All roadless proposals are evaluated by a standard set of criteria that has been established by DOI since RARE I.

Letter: 1632 I reject the arguments made in App J that maximum growth rates of pine should be the determinate factor in selection of silvicultural systems. Dendrochronologic studies of virgin pines and the lumber they yielded reveal considerably different growth dynamics than plantation-grown pines.

Response: The IDT is unsure what this comment refers to. App J describes the silvicultural systems & their related regeneration methods, & the species requirements of some trees known to occur in TX.

Letter: 1632 FS needs to investigate methods of inducing variable growth rates in stands to more closely mimic natural dynamics.

Response: We agree, this is presently being researched.

Letter: 1723 (pg 50 plan) define "equitable balance of resource values."

Response: Equitable is defined as dealing fairly or equally with all concerned by the Webster's Ninth New Collegiate Dictionary.

Letter: 1723 the DEIS has a glossary but the LRMP does not. Is the glossary for the DEIS also applicable for the LRMP? You need to make this clear.

Response: This revision follows the customary practice of one glossary for Plan/EIS documents. Terminology is consistent between the documents.

Letter: 1723 (MA-1-92) cannot simply classify 1000's of acres as suitable for timber production since this violates what any site specific analyses will tell you.

Response: Land suitability is a plan decision as explained on page 2 of the Plan.

Letter: 1723 (pg 71 DEIS) It also puzzles me why you would have alternatives like 5, 6, and 7 without fire when you have just stated what you did in the paragraph above (referring to grasslands).

Response: Alt 5, 6, & 7 have fire, but it is not emphasized as explained in the last paragraph of the same page.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 13-9 General

Letter: 1763 The FS should make every available effort to educate the public about desired future conditions in its implementation of the preferred alt In addition, attempts should be made to identify and promote other non-traditional, sustainable economic uses

Response. We agree, our Public Affairs Office is working on such a strategy now

Issue. 14 MINERALS

Issue. 14-1 Leasing

Letter: 1409 I have no objection to oil and gas leasing for people to make money It is along the trail (LSHT) I would want the company to do the work of re-routing the trail for use

Letter: 1453 I urge permission given for federal oil and gas leases in all zones but Special Areas, provided that proper limits on surface damages are imposed

Letter: 1636 I favor leasing and doing it in a manner that disrupts other NFGT activities the least

Letter: 1723 MA-5-31 - there must be no mineral exploration and development in Toledo Bend, period

Letter: 1723 Forest Service needs to do a better job regarding its activities on leasing minerals currently the FS allows counties to use gravel, sand, or iron ore for roads that go through or are near NF (pg 137 DEIS) there are sources of such materials that are offsite from the NF's that can be used and the taxpayers are not getting paid while the forest land is being destroyed

Response: Comment noted

Letter 88 No leasing of federal minerals in wilderness, scenic or biologic areas, not within 150 feet of streamside or trail corridors.

Letter: 412 Leasing okay, if minerals (oil & gas) can be produced from outside the corridors

Letter 1626 Limited mineral activity Ideally, I think mineral activity should be prohibited in the National Forests, but I also think all parties involved in this issue have to compromise I am sure there are some areas in the National Forests where mineral activity could take place without harm to the environment

Response. There are two categories of minerals on NFGT US Minerals are federally owned & we can deny lease of these The other class of minerals, known as reserved & outstanding, occur when the FS has the lands, but the party we acquired the land from retained the mineral rights Some stipulations can be placed on the surface occupancy (actual well site, etc) but we cannot deny owners the rights to their minerals

Letter 1566 Selling leases, minerals for below market value violates the trust of the real owners of these resources (the American people) Doing so distorts the market place by giving unfair advantage to those with access to public lands

Response: US minerals are leased using the competitive bid system Monies received go to the treasury with 25% returned to the county

Letter: 1575 recommend that there be no leasing of federally owned oil & gas in wilderness, scenic or biologic areas, and that elsewhere wells be more than 150 feet from streams and trails

Letter: 1622 not have mineral leasing on wilderness and on current as well as proposed special areas such as Research Natural Areas, Botanical Research or sensitive areas as operationally defined by the Texas Natural Heritage Program, RCW management areas, streamside management zones and other special site listed on pages 111, 114-116 of the plan not currently under protective designations

Letter 1679 There should be no leasing of minerals in protected areas

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue. 14-1 Leasing

Response: Leasing of US minerals in special areas is permitted with no surface occupancy. Reserved & outstanding mineral rights will be honored & managed according to FW S&G's. In wilderness areas, no new leases will be issued except when a nearby well on private rights is draining oil/gas from adjacent US minerals with no surface occupancy. Reserved & outstanding minerals in wilderness will be managed per the S&G's in MA-7. Minerals in MA-4 will be managed according to the S&G's in MA-4.

Letter: 1310 Alt 6 should be modified to allow for the leasing of federal minerals, except in wilderness or any type of special area, and with clauses prohibiting occupancy within trail zones and SMZ's.

Letter: 1385 The ban on mineral leasing seems to have been put in Alt 6 to arouse the opposition of the oil industry. While leasing should not occur in special areas, it could be carried out elsewhere without permanent roading or excessive clearing. No leasing should occur within 150 feet of streams or trails.

Response: Alternative 6 is the no lease alternative and we must have this in at least one alternative.

Letter: 1723 (MA-4-62) I am totally against selling public minerals in riparian areas. Remove "extent practicable".

Response: In leasing, there is a mandatory set back from streams, intermittent - 66 ft, perennial - 100 ft.

Issue. 14-2 Exploration and Development

Letter: 18 Lateral drilling should be used to protect these areas if nothing else can be done (referring to scenic and botanical areas, and streamside and trail corridors).

Letter: 1309 Alt 6, which eliminates leasing land for mineral exploration, would prevent any impacts to cultural resources from oil/gas exploration on FS lands. However, since the overall impacts to cultural resources on the NPGT has been relatively minor in the past, eliminating such exploration may be unnecessary. Alt 7, which simply decreases land available for leasing may be a more reasonable alt.

Letter: 1723 MA-4-63 - no seismic surveys should be done here either.

Letter: 1723 (MA-8a-62 and 63) I am totally against any oil and gas or other mineral development in these areas. A priority to buy up these rights and retire them so they will never be used.

Letter: 1723 (MA-9a-72) I am against the use of any recreation area for any mineral extraction.

Letter: 1723 MA-8f-52 - I oppose any disturbance due to minerals.

Letter: 1723 MA-4 62 - no public minerals must be leased in streamside zones.

Letter: 1765 There is no good reason shown for excluding oil and gas leasing from areas outside the wilderness, scenic or biological study areas and the 75FT protected-corridors along BOTH side of ALL streams and trails.

Response: Comment noted.

Letter: 1723 (MA-8c-62 & 63) I oppose any mineral development here. A standard is needed which will have a goal of buying up all mineral rights in special management areas.

Response: Given sufficient funds, this might be accomplished.

Letter: 373 However, I do believe that mineral extraction can and should take place in areas other than riparian zones (SMZ), trails and special use areas.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue 14-2 Exploration and Development

Response: Leasing of US minerals in special areas is permitted with no surface occupancy. Reserved & outstanding mineral rights will be honored & managed according to FW S&G's. In wilderness areas, no new leases will be issued except when a nearby well on private rights is draining oil/gas from adjacent US minerals with no surface occupancy. Reserved & outstanding minerals in wilderness will be managed per the S&G's in MA-7. Minerals in MA-4 will be managed according to the S&G's in MA-4.

Letter: 454 strip mined area is hardly what I call safe, scenic or enjoyable

Response: There is no strip mining being done on the NFGT.

Letter: 1632 Because of widespread development of outstanding minerals, US-owned minerals should not currently be developed that would result in increased surface disturbance. Outstanding minerals development should be focused, to the greatest extent possible, on areas previously or recently cleared for ROWs or timber-related activities.

Response: The national energy policy provides for environmentally sound development of US minerals. We negotiate with outstanding mineral owners to develop in the most environmentally sensitive manner that is reasonable.

Letter: 1723 (pg 43 DEIS) you show that wells will be drilled but on page 36 you showed none would be. Please explain.

Response: The EIS has been amended to clarify this.

Letter: 1723 (MA-3-42) remove "to the extent practicable" and require compatibility with wildlife management and dispersed recreation goals. There is no need to make oil and gas a dominant use which is what you are doing by making wildlife and recreation subservient to drilling activities.

Response: Change made to the FP site specific analysis on each individual project.

Issue: 14-3 General

Letter: 1723 (MA-8b) no mining must be allowed here

Letter: 1723 (MA-8b-61 and 62) I am against any oil and gas or other mineral extraction in river corridor

Letter: 1723 MA-8f-54 - I support the purchase of the mineral rights

Letter: 1723 (MA-9b-72) no geophones or other mineral uses of these areas

Letter: 1767 I believe that no changes should be made (from alt 1)

Response: Comment noted

Letter: 1175 no mining on public lands without a percentage going to the Government

Response: US minerals are leased using the competitive bid system. Monies received go to the treasury with 25% returned to the county.

Letter: 1175 No cyanide mining should be allowed to protect water table

Response: Cyanide mining is not used on NFGT.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 14-3 General

Letter: 1808 The "desired future condition" (in approximate number of acres) for each plant community and ecosystem should be determined in order to calculate the number of available acres for future oil and gas activities. It appears that the preferred alternative would concentrate mineral leasing on the remainder of the forests. We are concerned that this management strategy emphasizes mineral leasing to replace lost timber revenue resulting from RCW management.

Response: Acreage estimates for each MA and LTA's within that MA have been added.

Letter: 1723 (pg 140 DEIS) saying that the unreclaimed roads and drill pads per year will account for about 1.84 acres/site. reason this is biased is because it does not admit that the disturbance that has occurred and is being reclaimed will take 50-70 years for the forest to recover its original structure. Pads and roads that are unreclaimed due to production will probably be around for 10-30 years so that means that it will take close to 100 years for these sites to be rehabilitated back to the mature forest they were when cut.

Response: We use 20 years for the average life of a well. After that, it is rehabed & considered to be in some phase of production for multiple use.

Issue: 15 LANDS

Issue: 15-1 Landownership-Acquisition and Exchange

Letter: 1767 mention is made of the fragmented ownership pattern of USFS land and right-of-way problems that this causes. This works both ways because USFS land can be a barrier to private property as well as the reverse. A policy of cooperation should be adopted. Private property rights should be respected and the intermingling of properties should be no issue. Some of the property has been in family ownership for well over a 100 years.

Response: Comment noted.

Letter: 1671 Also, in order to manage and burn on an ecosystem scale, it will be important to consolidate management units as much as possible. This concept should be taken into consideration when trying to purchase or exchange land for the NF.

Response: This is long standing policy and is consistent with draft FLRMP as indicated by FW-085 on page 67 of draft FLRMP.

Letter: 1679 Private lands should be purchased to make the grasslands more contiguous, especially in the LBJ Grasslands.

Response: This is an allowable land adjustment process when funding is available and private landowner is agreeable.

Letter: 1723 (pg 125 DEIS) you need to have land ownership adjustment maps in this document so we can see where RCW habitat is and how acquisition could help. You traded away good mature pine habitat that was good for RCW for pasture and younger trees for Bela Keroli. This just demonstrates that you can sacrifice good RCW habitat when you want and make an excuse for it.

Response: RCW habitat is one factor considered in the land adjustment process. Landowner adjustment maps are located at District and Forest Supervisor's offices and serve as depicting a DFC.

Letter: 1723 (pg 125 DEIS) the demand for land uses by private interests must take a back seat to resource protection.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 15-1 Landownership-Acquisition and Exchange

Response: By law (NEPA) resource protection is evaluated on all land disposal actions

Letter: 1778 You should greatly expand the acreage of national forests such as to cover the area shown on state maps

Response. Total acres within the NF boundary depicted on state maps is approximately 1,730,937 while only 637,451 acres (37%) is currently administered as NFS lands. It is unlikely that support or funding will be available to substantially increase the current 37% situations

Letter: 1808 Issue 15 is very general and could use a better discussion of the USFS's land acquisition goals. It would also be helpful if there were maps or tables describing the location of proposed land acquisitions

Response: The Summary of the Draft EIS is very brief. Chapter IV of the draft FLRMP provides more specific goals and objectives. This issue is addressed by Forest-wide S&G labeled FW-084--FW-090, found on pages 67-69

Letter: 1310 No rock mining should be permitted in Upland Island Wilderness. If it is shown that private claim to any subsurface materials in the wilderness is valid, then the FS should buy out the claim, even if it requires using the power of eminent domain

Response. To accomplish this, there must be appropriated dollars from congress

Letter: 1723 FW-086 - what variances are allowed? I do not approve of variances unless you have some strict guidelines

Response: There are no specific variances

Letter: 1723 FW-089 - what are these variances. I am against . special use permits that allow occupation by structural improvements,

Response: FW 89 does not deal with special uses, it deals with exchange & disposal guidelines

Letter: 1723 (pg 68) - you should add acquisition of state listed or TOES listed species habitat. In addition the Sierra Club proposal which was submitted in 1991 should also be the basis for deciding which lands to acquire

Response: This is reflected in the listed priorities

Issue: 15-2 Land Uses

Letter: 1644 The Resource Management Plan that continues to provide the best balance between the public who use these areas for recreational activities and the owners of livestock which graze areas would be the plan that I endorse. The use of the grasslands for grazing not only provides pasture spaces but also eliminates the continual build-up of grass and brush which would reduce the usage of this land for recreational purposes

Letter: 1723 (pg 125 DBIS) you absolutely ignore the impacts that military use of NF land can have. You must give guidance to the districts about what is and is not acceptable

Response: Comment noted

Letter: 1723 (MA-4-51) .what does compatible mean. Be more specific about what is and is not allowed.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 15-2 Land Uses

Response: Compatible is defined by the Webster's 9th New Collegiate Dictionary as "capable of existing or operating together in harmony "

Letter: 1808 Part II(a), Environmental Consequences of the Alternatives, Land Uses, p 126 This section states " valid existing rights may override management objectives " to grant land use authorization permits A statement should be included here to clarify that endangered species' concerns may take precedence over granting some of these land use permits, and example may be when these authorizations involve a "take" of an endangered or threatened species

Response: We have no authority in activities related to reserved or outstanding valid existing rights, we can only recommend management actions for operators

Letter: 1723 (MA-9a-62) do not assume such special use permits will be granted Use the word may and add "if ecosystems are protected and not overused "

Response: The IDT disagrees

Issue: 15-3 Property Boundary Management

Letter: 1723 (pg 126, DEIS). what assessment has been made on timber cutting at the boundaries In other words stealing of NF timber?

Response: This is part of the land line & encroachment administration process

Letter: 1723 FW-083 - remove "as feasible"

Response: The IDT disagrees

Issue: 15-4 General

Letter: 1723 FW-090 - I want the acquired lands to undergo public review via a plan amendment so the public can review and comment

Response: This standard pertains to the management area classification of lands already acquired

Letter: 1723 (MA-8b-51) define compatible

Response: Compatible is defined by the Webster's 9th New Collegiate Dictionary as "capable of existing or operating together in harmony "

Letter: 1723 (MA-8b-52) remove "where practicable" and "reasonable alternative" not measureable Standards must be measureable

Response: The standard has been changed to reflect your concern

Letter: 1723 (MA-8b-53) "significant public benefit" must be defined or removed

Response: Significant public benefit is determined on each land exchange based on site specific information

Issue: 20 PLAN STANDARDS & GUIDELINES

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 20-1 Forest wide

Letter: 1723 (pg 58, DEIS) I favor using pheromones, with no cutting in scenic areas and other sensitive areas not just SPB's that go from wilderness or other areas into the general forest but also SPB from the general forest that goes into wilderness Also, SPB goes from private lands into FS lands you do not talk about this and what you will do when this happens FS is required to do a site specific analysis when proposing cutting in wilderness near private property to see if the landowner is doing all they can to reduce SPB problems but you do not do this

Response Comment noted

Letter: 1723 (FW-077) I am against shortened rotations since you will perpetuate dense pine stands that will be susceptible to SPB and you will prevent OG from occurring and interior forest species thriving No SPB cutting or control should be done in wet soils where timber will be cut

Response: The IDT doesn't understand this comment Rotation ages are as long or longer in this revision than in the 1987 plan

Letter: 1605 FW-022 - A decision to use a non-native species should be accompanied by a detailed plan to convert to native species, instead of a generalized statement to that effect

Response: This standard directs use of native species unless concerns for sedimentation, water quality or other immediate factors dictate the use of desirable non-native species

Letter: 1605 FW-022 - Desirable non-native species available for use need to be defined and included in the plan

Response: See Plan App B for rehabilitation recommendations

Letter: 1605 FW-022 - It should be stressed that non-native plant species are to be used only if no native species are adequate for erosion control

Letter: 1605 FW-022 - An assessment of the need to use non-native species should be done on a case-specific basis instead of on a general basis

Response. The standard states appropriate native plant species The guideline that defines the use of non-natives is site specific cases where native species will not provide adequate soil & water protection

Issue: 20-2 MA1 - Upland Forests

Letter. 1808 MA-1, Standards and Guidelines, Silvicultural Management p 91 The diameter limits listed for scheduled regeneration cuttings are inconsistent with those in the DEIS for the management of the RCW and its habitat on NFs in the Southern Region Smaller diameter limits are acceptable if uneven-aged management is implemented, however, larger diameters are required when irregular shelterwood is used Irregular shelterwood leaves older trees with larger diameters and these trees produce higher quality seed sources Therefore, we recommend the diameter limits be increased to reflect those in the draft RCW EIS

Response: The IDT agrees The final revised plan has been amended to reflect this Diameter limits will be based on a site-specific analysis

Letter: 1723 (MA-1-19) 10 yrs is too long to re-establish vegetation It needs to be 3 yrs at the maximum Otherwise you assure erosion and water pollution and continued fragmentation

Response: Ten years is the maximum allowed under 36 CFR 219 27 (11)

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 20-2 MA1 - Upland Forests

Letter: 1723 (Pg 65, DEIS) analysis says Maximum Timber alternative gives more gray squirrel habitat acreage than the Maximum Wilderness alternative make no sense Since there will be disturbances that mimic Nature and more den trees because trees will be allowed to grow and die in Wilderness, and maximum acorn production will be allowed on more acres because they will not be cut down, and because riparian and bottomland areas that gray squirrels like will be less disturbed in the Maximum Wilderness alternative it makes no sense to say that it has lower gray squirrel acreage than 4 of 6 alternatives

Response: Your assessment is in error Maximum SMZ acres occur in Alt. 6 & 7, however, this does not equate to bottomland hardwood acres as described in the IES Alts also are evaluated on a combination of species, not a single species such as the gray squirrel Habitat for all small game species evaluated is in fact higher in Alt 2 than 6 or 7

Issue: 20-3 MA2 - RCW

Letter: 1808 It is, therefore, recommended that a standard be included in MA-2 which allows for reconsideration of the location of RCW recovery population in east Texas

Response: This can be discussed during consultation with USFWS

Letter: 1723 MA-2-19 - 10 years is too long to revegetate a road. The standard should be 2-3 years

Response: Ten years is the maximum allowed under 36 CFR 219 27 (11)

Letter: 1808 MA-1, Standards and Guidelines, Facilities, p 100 We recommend changing the statement in MA-2-16 to include language for forest fragmentation, i e , "Restrictions may be implemented in response to resource programs, such as wildlife, forest fragmentation, recreation, "

Response: Changes have been made in the Plan and EIS to discuss concerns regarding fragmentation

Issue: 20-4 MA3 - Grasslands

Issue: 20-5 MA4 - SMZ's

Letter: 1632 MA-4-42 - Pesticides should not be used within MA-4 Substantial limits, free of loopholes (as in MA-4-42) should be set to assure MA-4 is not degraded by continuing timber harvests or cuts Behavioral chemicals should be used without cutting if action becomes necessary

Response: Comment noted

Letter: 1632 MA-4-41 - suggests that MA-4 would in fact be subjected to the same insect control criteria as MA-1 and MA-2 I recommend no cutting of SPB infestation within MA-4 since harvesting jeopardizes SMZ integrity as discussed previously Uncut trees provide the benefit of organic matter, snags, cavities, and downed woody material for skunks, salamanders, and food chain insects

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue 20-5 MA4 - SMZ's

Response: SPB infestations will normally be allowed to run their natural course, unless a site-specific analysis indicates one of the conditions listed in FW-4-42 exists

Issue 20-6 MA5 - Aquatics

Issue 20-7 MA7 - Wilderness

Letter: 1723 (MA-7-12) the only fish control projects I support is to protect endangered or threatened species or to remove exotic or species that do not occur in that area naturally

Letter: 1723 I am totally against any wildlife habitat improvement for aquatic resources unless it is linked to restoration of natural processes or ecosystems that cannot restore themselves (MA-7-13)

Letter: 1723 (MA-7-33) I am totally against any kind of fuel reduction done just to reduce fuel

Letter: 1723 (MA-7-45) I am against control of SPB in wilderness area

Letter: 1723 I am totally opposed to MA-7-48, which allows logging of wilderness areas Cut and remove is not compatible with wilderness values or the wilderness act's need for the minimum tool use

Letter: 1723 I favor a S&G which acquires all mineral rights that the government does not own in wilderness areas Why not favor this maximum protection alternative and provide it as an option for a S&G?

Letter: 1723 (MA-7-93) am not necessarily in favor of designated campsites for outfitters I also am not in favor of horse use in the wilderness

Letter: 1723 (MA-7-98) I fully support that the activities that least alter wilderness and are most dependent on wilderness must be protected

Letter: 1723 (MA-7-101) I fully support the primitive travel and communications requirement

Response. Comment noted

Letter: 1723 (MA-7-11) natural native aquatic resources need to be defined

Letter: 1723 (MA-7-161) define natural native species Wildlife does not need active managing in wilderness

Response: This standard has been clarified in the final document

Letter: 1723 The S&Gs do not address air quality (MA-7-03) in terms of air monitoring that needs to be done near wilderness There is no standard for interacting with EPA and TNRCC on a regular basis to ensure that all wildernesses are not being harmfully impacted by air pollution

Response. FW guidance has clarified all air quality standards

Letter: 1723 (MA-7-47) the FS is not currently really doing a site specific analysis of the adjacent landowner's property When do you say no to a landowner, that they are not managing their land to reduce SPB?

Response: A site-specific analysis of adjacent landowners' property is always done prior to SPB treatment in wilderness

Letter: 1723 (MA-7-71) define "significant disturbance to the surface." What does this mean and how will this be implemented?

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 20-7 MA7 - Wilderness

Response: Significant is defined by the Webster's 9th New Collegiate Dictionary as "having or likely to have influence or effect" A determination of significant disturbance will be made on a site specific basis

Issue: 20-8 MA8 - Special Mgt Areas

Issue: 20-8-1 RNA

Issue: 20-8-2 Candidate W&S River

Issue: 20-8-3 Scenic Areas

Letter. 1723 MA-8d-62, MA-8f-54, and page 195 Lake Fannin Organizational Camp, and page 197 Attoyac Bayou Ayish Bayou and Cochino Bayou Archeological Areas, and page 198 Old Aldridge Sawmill and Mill Town, all of these areas should not be drilled, should not have seismic surveys, and should have any private mineral rights bought

Letter. 1723 MA-8c-B2 - no mountain bikes or horses should be allowed in Winters Bayou Scenic Area

Response: Comment noted

Issue: 20-8-4 Botanical Areas

Issue: 20-8-5 Riparian/WL Areas

Letter: 1655 MA-8d-03 - Grazing permits should be phased out completely Grazing constitutes an introduction of an exotic species

Response. Comment noted

Issue: 20-8-6 Archeological/Historical

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 20-9 MA9 - Recreation

Issue: 20-9-1 Developed Recreation Sites

Issue: 20-9-2 Semi-Primitive Recreation Site

Issue: 20-10 MA10 - Adm & Special Uses

Issue: 20-10-1 Adm Use Sites

Letter: 1723 (MA-10a-02) environmental impacts and floodplain impacts must also be looked at here
Letter: 1723 (MA-10a-15) require that composting and incineration toilets are used instead of septic systems
Letter: 1723 (MA-10a-23) fire towers will be used for wildlife viewing, forest appreciation, and scenic beauty
Letter: 1723 (MA-10a-41 and 42) I am against the use of pesticides unless it is for specific targeted areas
Letter: 1723 (MA-10a-101) no unprogrammed timber harvest must be permitted either Only imminent danger hazard trees can be cut
Letter: 1723 (MA-10a-103) is duplicative with 101 and must be eliminated
Letter: 1723 You need to require energy conservation and alternative energy use in designs and modifications and renovations

Response: Comment noted

Issue: 20-10-2 Special Use Permit Areas

Letter: 1723 (MA-10b-21-24) I am opposed to the use of herbicides and pesticides
Letter: 1723 (MA-10b-33) I agree that ROW need to be consolidated and this must be a requirement and not just encouraged
Letter: 1723 (MA-10b-34&35) I agree
Letter: 1723 (MA-10b-37) I support the exclusion of landfills but also you must put gravel pits on this list
Letter: 1723 (MA-10b-38) I object to the exceptions Only one access road is needed for each private property surrounded by NF
Letter: 1723 (MA-10b-72) remove "where needed" and require this
Letter: 1723 (MA-10b-101) I want no programmed or unregulated timber harvest Define "unreasonably interfere "

Response. Comment noted

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 20-10-2 Special Use Permit Areas

Letter: 1723 (MA-10b-42) define compatible and remove "as appropriate".

Response: Compatible is defined by the Webster's 9th New Collegiate Dictionary as "capable of existing or operating together in harmony "

Issue: 20-11 SFA Exp Forest

Letter: 1723 you need a VQO assigned overall to this forest I suggest semi-primitive nonmotorized

Letter: 1723 (MA-11-02-05) I want no mineral development of the area and no cutting of bottomlands

Response: Comment noted

Issue: 20-12 M & B

Letter: 1723 (pg 236) objectives are too weak and not detailed enough or show what monitoring results will actually cause a change to occur In fact the entire table 1 for Monitoring Questions is this way, too broad and not specific for quantification of what monitoring results you want

Letter: 1723 The S & Gs are too weak and often are not measureable in both a quantitative and qualitative fashion If you have a standard it must be measureable and many so-called standards are not measureable

Letter: 1723 you are not able to sample quantitatively to show what is happening with your present system and therefore you have a monitoring system that is not measurable

Letter: 1723 (pg 235 plan) you also need to train the interested public to identify sensitive species

Letter: 1723 Obj 3b cost efficiency must not be the sole criteria Environmental protection must be the sole deciding factor

Letter: 1723 Obj 3k land use authorizations should only be issued if they are compatible with environmental protection and ecosystem evolution and continuity

Letter: 1723 (pg 242) your snags/acre numbers are too low

Letter: 1723 (Obj 1c) wilderness management needs to take into account that we need to allow evolution to occur and we are simply caretakers and not active managers of the area

Letter: 1723 I have looked throughout this document and I see no real better monitoring effort than is mentioned on p 6 of the DEIS [indiscriminant shooting]

Response: Comment noted

Letter: 1723 Obj 4d are the plan estimates too damaging for the forest?

Response: See EIS appendix B for constraints used with all alternatives These constraints insure that timber harvest levels are at sustainable levels that do not impair the long term productivity of the land This is in accordance with Section 4 of the MUSYA of 1960

Letter: 1723 Obj 4f do you want to minimize losses? Is this realistic? Will this reflect a real decrease in susceptibility or just that you have cut down all the old trees Nongame species need to be monitored for impacts here since we know that sensitive species like Trillium can be negatively impacted

PLAN AND KIS COMMENTS
Comments by Issue and Response

Issue: 20-12

M & B

Response: Yes, we plan to minimize losses through hazard reduction and prompt control of infestations. This will not be solely through cutting down all old trees, as rotation ages have increased in many areas. The actual decrease in susceptibility will be influenced by the management S&G developed to reach a DFC in each MA.

Letter: 1723 You do not protect the forest "significantly" because you do not have a monitoring program that will qualitatively and quantitatively determine ORV impacts. Your monitoring program is woefully lacking yet you want to build more trails and encourage more use when present trails are already not up to standards.

Response: The FP proposes to manage ORV use on designated trails in order to reduce and minimize resource damage. Managed trails will provide better resource protection.

Letter: 1723 (pg 182 DEIS) it is not acceptable to justify allowing more ORV use because available use areas is scarce for this activity.

Response: ORVs have been identified as a legitimate use of the NF. It is definitely a recreational pursuit. Our intention is to manage ORVs, to minimize resource damage.

Letter: 1723 Obj 4a how do you measure if long-term loss of future productivity of the land is occurring?

Response: Through a long-term monitoring program.

Letter: 1723 Obj 3e how do you tell if ROW achieves better forest management and more efficient management of public lands?

Letter: 1723 Obj 3c how do you tell if landownership adjustments are "improving management and consolidation"? What are you measuring here?

Response: Some units of measure include reductions in landline miles and corner monuments to maintain.

Letter: 1723 Obj 2c. it is not just openings that you need but also you need to say that certain places have not been cut and do not cause ugliness.

Response: Variety is the objective, without causing ugliness.

Letter: 1723 Obj 4e it is not demand that should drive grazing, but ecosystem function. What is sustainable grazing?

Response: Grazing is regulated by carrying capacity on each allotment, balancing against all needs such as wildlife needs.

Letter: 1723 You also need a notebook with a picture of each species so people can identify them in the field. Your questions are too general. You need to determine population levels. Not just indicator species but all threatened, endangered, sensitive, unique species and plant communities plus species like interior forest species and neotropical migrants that are declining.

Response: Time and resources prevent 100% inventories. The MI program provides a logical process to monitor a wide range of related species.

Letter: 1723 Obj 2f what is sufficient levels of law enforcement? What are not?

Letter: 1723 (pg 237) what are sufficient levels for law enforcement? What deficient do you have now?

Response: Sufficient law enforcement keeps within the budget, provides education and presence and is a strong deterrent. Anything less than that is not sufficient law enforcement.

Letter: 1723 Obj 1d where are the soil erosion standards, etc? You need numbers here. You need to quantify.

Response: Erosion and sediment outputs are discussed in the DEIS.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 20-12

M & E

Letter: 1723 Obj 5a are all streams being monitored?

Response: All streams are not monitored We have streams on each Forest where baseline water quality data is collected

Letter: 1723 Obj 5d how will you tell if ozone is impacting forest vegetation?

Response: See EIS Chap III, part IIa for discussion on Ozone concerns and documentation information SFAU is conducting ozone research studies at the FS Experiment Station Data will be used from these studies Also, the Forest has conducted ozone studies on the Sam Houston National Forest

Letter: 1723 Obj 1f it is not just if target species are using corridors but are they thriving and viable populations How much cutting is done? What are the effects of disturbance on riparian areas?

Response: S&G are designed to protect the value of riparian areas

Letter: 1723 Obj 1g should go under Obj 1e You need to restore the natural frequency, intensity, seasonality, timing, and regime of fire But this is not an objective

Response: Lightning fires were only one source of pre-settlement ignition Native american burning is also part of the fire history of these areas The planned burning cycles are part of the overall mgmt intended to produce the DFC's The DFC's provide the diversity required by the NFMA

Letter: 1723 Obj 4g does prescribed burning provide the frequency, regime, intensity, seasonality, and timing characterizing a return to natural ecosystem functioning?

Response: Ecosystem mgmt does not mean that all mgmt activities must mimic that which would occur "naturally" The prescribed burning cycles are consistent with these fire allocated ecosystems & will help meet the DFC

Letter: 1632 My experience and comments reflect insufficient/inaccurate monitoring and evaluation of NF management activities (plan pg 231) Too often projects are finished and forgotten with little thought of the possibility of ongoing impacts I have seen cases where erosion control proved inadequate and within one year of closing sale, massive erosion and stream siltation were occurring It was only through my notification that the FS became aware of the problem and was able to take corrective action

Response: Continual monitoring is a constant effort to ensure quality control As identified in Chapter V, assistance through many sources, especially the public & individuals, is appreciated

Letter: 1723 Obj 1e why are you emphasizing only fire dependent ecosystems? How is significant and restored defined here?

Response: Objective recognizes all systems, an emphasis is placed on fire dependent ecosystems due to high proportion of T&E species that require this habitat

Letter: 1723 (pg 231 plan) how do you address via monitoring how effectively public concerns are being addressed? What mechanism are you using to get constant feedback on plan implementation I do not see the role the public plays in the monitoring and evaluation program

Response: Objective 3h encourages the association with the public in general for all activities

Letter: 1723 (pg 233 plan) It bothers [me] on page 223 that "Not every goal, objective, or standard and guidelines can be monitored at every level " This does need to be done You also need to prioritize your monitoring efforts based on the impact that an activity or use will have on the environment I do not see that type of prioritization committed to here Why not?

Response: The M&E process will be continually improved based on annual activities Table 1 sets the questions in place which will allow better prioritization & identification of monitoring actions

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue 20-12

M & E

Letter: 1723 Obj 2d trails What is unacceptable damage to resources or conflicts with other users?

Response: Unacceptable damage occurs when S&Gs, State BMPs or other resource mitigation measures are unsuccessful Conflicts are readily observed through public concern & intensity

Letter: 1723 Obj 3a what are "positive characteristics of sustainability" What "ecosystem elements" are you talking about?

Response: Positive indicators of ecosystem sustainability include improvements in the basic biological, physical and social elements within an ecosystem Longterm improvements in water quality or soil productivity are examples

Letter: 1723 Obj 3h how many volunteer/partnerships do you want? What is your number goal here?

Response: The USFS is continually expanding partnerships & cooperative activities No number has been targeted for a successful program

Letter: 1723 Obj 4c what is the desired ecosystem diversity? You only talk about even age stands Why do you ignore uneven age stands? What is sound forest health and diversity? A definition is needed here

Response: Uneven-aged stands are addressed in 4c(1)

Letter: 1723 (pg 241-242) everywhere you have Element Occurrence Record, this is not good enough This does not tell how the species population is doing Is it viable Also you need to know the locations of all the populations and this will not necessarily get you there When do you stop monitoring? When you have one EOR, two, or how many?

Letter: 1723 (pg 241) under the LL-bluestem series it is just not acres that are important but the quality of the habitat How will you measure that? Large LLP, the amount of bunch grass and the extent geographically of populations are things you must take into account You also need to know the number of individuals in populations I also feel that the Slender Wakerobin is a Mesic species but you have it under Dry-Mesic & Xeric Oak-Pine Forests Further you do not take into account that if you manage all of SHNF for the RCW you will end up destroying Wakerobin habitat by cutting for RCW and SPB But these kinds of distinctions do not show up on your chart Also under LA Black Bear, you need a goal of the number of individuals that you will reintroduce and the population you want The acres of habitat mean nothing (much is there right now) without bears reintroduced The same goes for Red wolves which you totally ignore

Response:

The Mgmt Indicators Table has been revised to address your concern

Letter: 1723 (pg 123 DEIS) you admit you have no air monitoring in the grasslands and you propose to do none There are zero air monitors in the grasslands so to say that monitoring indicates that air quality over the National Grasslands meet the NAAQS is untrue How can we tell what effects ozone or acid rain has if there is no plan to do monitoring

Letter: 1723 acid rain network for monitoring is woefully inadequate and the FS needs to do some acid rain monitoring You also need visibility monitoring to see if the Houston airshed is reducing NF visibility in Sam Houston NF

Response: The M&E table has been revised to reflect your comment.

Letter: 1723 Obj 5c you need to look specifically at erosion that is due to ORV use and logging

Response: Erosion & sedimentation concerns are being addressed in ongoing monitoring actions for both ORV & timber harvest activities

Letter: 1723 (pg 83 Plan) it is ridiculous that you allow ORV use when you have no local studies that document the effects of noise, disturbance and other effects on wildlife by ORV's You must put together a research plan that looks at monitoring and research of ORV impacts and how to mitigate these or whether these can be mitigated

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 20-12 M & E

Letter: 1723 (pg 120 DEIS) you state the "The Forest ORV Plan . " but there is no monitoring program proposed that will tell you if nonpoint source water pollution is in fact occurring due to ORV use

Response: See Plan App E, ORV Mgmt The emphasis placed on inventory, evaluation and mgmt, to include closures of ORV trails will be a high priority in the new Plan Monitoring and investigation will be a key component of this effort

Letter: 1723 (Obj 3i, pg 239) How will you tell if recreation is having a positive or negative benefit on rural economics and how will you tell how many jobs are created?

Response: Close cooperation with extension programs rural development activities and local communities provide valuable information & reports to gauge success

Letter: 1723 MA-2-41 - how will you monitor wildlife and cattle competition for browse and herbaceous plants?

Response: See Plan App G

Letter: 1723 (Obj 4b) How will you determine if huntable populations are not detrimental to nongame species? What does viable mean here and where will you get those figures?

Response: M&E activities & public concern will identify changes in non-game populations The term viable has been removed from the final plan

Issue: 20-13 General

Letter: 1723 (pg 45 Plan) you talk about having more partnerships, communication, and cooperation with local communities What about the rest of the interested public?

Response: The USFS is continually expanding partnerships & cooperative activities No number has been targeted for a successful program

Letter: 1723 (pg 47, LRMP) it is needs and not demands that must be met Needs are survival requirements while demands are what you would like to have but do not necessarily need to live

Response: You're right That is part of the criteria for evaluation Everyone makes demands & that certainly doesn't mean they are needed It is the objective of the Planning effort to review demand & need and develop a range of alternatives that address these concerns

Issue: 30-1 EIS Appendix A

Letter: 1723 (pg 6) your screening eliminated alternatives that you may not have been able to implement but which others could implement Yet CEQ regulations require you to look at such alternatives and not use the excuse that you cannot implement them as a way to avoid doing alternative analysis

Response: While this comment references page 6 of EIS Appendix A, which discusses the process used to identify issues, it refers to screening alts Step 4 of the issue identification process discusses the criteria used to screen substantive comments This is a different process from the one used to develop alternatives, which is described in the EIS, chapter II, pages 12-14

Letter: 1723 (pg 6) in my view personnel is also a germane issue since the plan cannot be implemented without an adequate number of a certain type of personnel from certain disciplines What will reduced budgets do to your being able to hire enough people with the right qualifications to do the job you say you must do?

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 30-1 EIS Appendix A

Response: Personnel matters are outside the scope of FP Land & Resource Mgmt Plans guide all natural resource mgmt activities & establish mgmt S&Gs for NFS lands Since matters such as personnel & annual budget opportunities are not controlled by the Forest, they were eliminated from consideration as significant issues to be considered in the planning process

Letter: 1723 (pg 7) many project level decisions contain decisions that need Forest level mandate but do not have them For instance cutting in riparian areas for other than timber purposes Also residual damage standards are needed since the project level never seems to implement any and trees left after cutting for any reason are unnecessarily destroyed or damaged We need stricter controls or districts get sloppy You also need to audit your districts to ensure they do the right thing

Response: Project level decisions must tier to the FLRMP or else the FLRMP must be amended to allow for the decision The regulations that specify FLRMP amendment procedures are located in 36 CFR 219.10 The comment appears to cite an example of a mgmt practice (timber cutting in riparian areas) that was not allowed or provided for in the 1987 FLRMP However, timber cutting in riparian areas was allowed under certain conditions outlined on pages IV-87 through IV-89. S&Gs for the treatment and/or protection of residual vegetation are found in the Revised Plan, chapter IV, pages 75-79, & in the individual Mgmt Area descriptions for MA1 (page 91), MA2 (pages 103-107), MA4 (pages 129-130), MA7 (page 143), MA8c (page 169), MA8f (page 194), and MA10b (pages 218-219, 221) Procedures for monitoring FLRMP implementation are outlined in the Revised Plan, chapter V Monitoring & Evaluation Reports will be done at least annually & will be available for public review

Letter. 1723 (pg 6) FS must respond to needs, not demands Demands are not necessary Needs are

Response: You're right That is part of the criteria for evaluation Everyone makes demands & that certainly doesn't mean they are needed It is the objective of the Planning effort to review demand & need and develop a range of alternatives that address these concerns

Issue 30-2 EIS Appendix B

Letter: 1723 (pg 37). I do not agree that dispersed recreation is compatible with timber management activities cannot hide the destruction you do to dispersed recreation with even-age timber activities

Letter: 1723 (pg 29, DEIS) the mixed forests are not even close to being identical in terms of developing standards In addition why do you have so much fire in these mixed systems

Response: Comment noted

Letter: 1723 (pg 44) it is important to note that forest industry lands have been overcut I object to this subsidized private abuse on my public NF lands The NF lands get the environmental abuse because industry has environmentally abused its lands

Response: See EIS appendix B for constraints used with all alternatives These constraints insure that timber harvest levels are at sustainable levels that do not impair the long term productivity of the land This is in accordance with Section 4 of the MUSYA of 1960

Letter: 1723 (pg 9 15) it is not clear if you included SPB, salvage, sanitation cuts in the model . you need to give the public some idea about the limitations and problems the FORPLAN model has so they can understand better its ability to give good answers

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 30-2

EIS Appendix B

Response. Per CFR 219.3, the ASQ is defined as "the quantity of timber that may be sold from the area of suitable land covered by the forest plan for a time period specified by the plan." Within the planning period, the volume of timber to be sold in any one year may exceed the average annual ASQ so long as the total amount sold for the planning period does not exceed the ASQ. Nothing in this paragraph prohibits salvage or sanitation harvesting of timber stands which are substantially damaged by fire, windthrow, or other catastrophe, or which are in imminent danger of insect or disease attack and where such harvests are consistent with silvicultural and environmental standards. Such timber may either substitute for timber that would otherwise be sold under the plan or, if not feasible, be sold over and above the planned volume." (CFR 219.27 (c) (2)). However, the NFGT has historically substituted salvage timber for green timber. The ASQ identified in the FP was calculated on Lands Suitable for Timber Production only and therefore does not include any volume removed from lands such as special areas and SMZ's.

Letter. 1723 (pg 61) you say that Alt 6 is the maximum wilderness benchmark legally allowable there is no legal allowable for wilderness. If Congress wants to it can designate an entire NF as wilderness. So this is as artificial a restraint as anything.

Response. Agreed. The constraint was not on the number of wilderness acres, but on the number of acres needed to meet other constraints such as threatened and endangered RCW that needs land to be managed in a different way than those set aside for wilderness.

Letter: 1723 (pg 59) 95% of culmination of mean annual increment of timber volume growth is a logging constraint and not a biological one. This biases the FS against old growth and does not allow real OG to occur with your favored proposal.

Response. See Glossary of DEIS for description of CMAI. See previous table for actual age of existing timber at harvest.

Letter. 1723 why are you even looking at such low rotations of 40-60 yrs when you know they do not have a chance biologically, politically of making it and are the antithesis of ecosystem management?

Response: The direction is to analyze a wide range of alternatives and what the effects and impacts will be. Then to select a preferred alternative that would provide for needs presented in the issues and sub-issues along with the RPA philosophy. Non-valued items such as politically acceptable are considered by the Forest Supervisor and the Regional Forester in selecting the final alternative but is not modeled other than possible side boards in feasibility of alternative analyzed.

Letter: 1723 (pg 16) FORPLAN Version II is an economic model and it does not give credence to ecological values which cannot be expressed in dollar terms. Maximizing PNW is an economic criteria and is not an ecological one. Assumptions made often are subjective, goods oriented and not quality oriented. Mistakes can occur. Information is not ground truthed before it is used in FORPLAN.

Response. The FORPLAN model is a useful tool to aid the FS to understand the nature of Forest planning problems (not the optimal answer). Its major purpose was to provide insight into the behavior of multiple resources and their interactions, which in turn were used to guide the development of effective plans and decisions. The model is used more appropriately to prevent wrong decisions, that which is prescribed by each resource is not in conflict and can be implemented. The FORPLAN model is simply a tool to be used with other tools in preparing implementable Forest plans.

Letter: 1723 (pg 9) how accurate were the 1987 projections for all different output levels of all different services? Why were there differences?

Response: Annual Monitoring and Evaluation reports have been prepared and results were included in reports to the public and in preparation of the AMS. See these documents. Major reasons for differences were the RCW ruling and lack of funding.

Letter: 1723 (pg 2,3) what % error do the FORPLAN models and other models you use have? It must be remembered that the AMS stopped collecting data, in most cases, in 1990. A lot has happened on the ground since then to not make it the very best analyses you have.

Response: See previous comment for purpose of FORPLAN comment noted. We agree things are changing.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 30-2

EIS Appendix B

Letter: 1632 does an adequate job of detailing the complexity of factors affecting the timber economy, but it ultimately focuses the discussion of economic impacts of the alts on deviations in job numbers based on a limited number of factors I must stress that the linear relationship between timber outputs and jobs is an inaccurate reflection of actual conditions Additionally, other factors related to economics, modernization and supply/demand are so influential to the big picture, that the job fluctuation figures used by the FS cannot be used to accurately depict the real-life situation

Response: The local economic effects of forest resource management policies will vary depending on the structure of a community's economy and it's diversity A community that relies heavily on the forest products industry will be affected by timber management planning, whereas a community that depends on recreation and tourism will be affected by recreational resource management Diversified communities will be less affected by changes than a community which depends largely on one resource The economy of East Texas is based on natural resources including wood, petroleum, and coal The manufacturing of products from the timber growth in Texas forests is a vital part of Texas economy, as well as the regional and national economy Twelve of the deep East Texas counties comprise the most timber dependent region in the state Primary processing operations for southern pine lumber, veneer, and plywood are concentrated in eastern Texas See the Social-Economic Overview Document prepared by Catherine Albers, December 1990, section 8, pages 158-235 Now these jobs that are associated with our timber harvesting may be able to be filled by competing timber ownership if the FS reduces supply

Letter: 1723 (pg 2) the FS has not dealt with the stewardship issue well . the FS said it would pursue National Trail Status for the entire Lone Star Hiking Trail and then in the early 1980's dropped any effort to do this without being honest and saying it would pursue this effort FS must resolve and propose actions to move forward on trail designation in this management plan and EIS

Response: In the Sam Houston Land Management Plan, Dec 1978, page 87, we did state we would pursue National Trail Status During the process it was determined that the portions that crossed private land would have to be acquired. The cost of acquiring forced the dropping of pursuit of National Trail Status The recreation program nationwide has a large (more than \$1 billion) infrastructure backlog in recreation facilities, trail maintenance and reconstruction, and recreation related roads and bridges This backlog is continuing to grow At the same time, recreation use on NF continues to increase Therefore in the FLRMP of 1987, it was determined to manage the Lone Star Hiking Trail with the standards of maintenance and buffers on a National Recreation Trail on forest land but not pursue acquiring those acres of off forest lands

Letter: 1723 (pg 68,71) again you use a timber not ecological or biological constraint by being at or above the CMAI This is not necessary for this plan or model you limit uneven age management which does not have to be done since you can manage for mixed stands with this management system Ecosystem Management should not allow unnecessary constraints like these

Response: This constraint keeps the model from harvesting before CMAI as required by 36 CFR 219.16 (a) (2) (111)

Letter: 1723 (pg 27-30, DEIS) rotations that you tried are a travesty Why did you try rotations that obviously are not biologically or ecologically sound? To try 40-70 yr rotations when these are not possible makes no sense

Response: CMAI for southern pine in TX is approximately 30-35 years Forty years was used for the benchmark constraint to determine what would be biologically possible

Letter: 1723 (pg 38) You cannot bring the habitat needs of squirrels down to just one thing You are oversimplifying for the model too much It is also disturbing that there are no road density limits in the FP At the very least you should try different road densities

Response: Appendix B describes the coefficients & process of their use in the FORPLAN model The process record & information used in the development of each coefficient is extensive & is comprised of many factors

Issue: 30-3

EIS Appendix C

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 30-3

EIS Appendix C

Letter: 1723 does not fully discuss the problems with oil and gas drilling in the NF and grasslands On pages 11-12, it is not just the Sabine but also the Angelina, Davy Crockett, and Sam Houston NF's that have had cumulative impacts occur but have had these ignored in the EA's the FS sometimes does

Response: Comment noted

Letter 1723 (pg 34), you need additional stipulations The FS's policy seems to be that people have to prove drilling should not go in instead of the leasee proving that they need to drill you give an overriding preference over all other activities This is not allowed under multiple use and sustained yield legislation

Response: The FS views exploration, development, & production of mineral resources as part of our ecosystem mgmt responsibility There is no preference to minerals, but coordination with other resources, part of multiple use does pertain to minerals

Letter: 1723 (pg 35), you cut the public out of leasing because no NEPA documents are developed to tell about what the committed resources and impacts will be if the leasing occurs There is no chance for the public to give input

Response: NEPA for leasing is included in the FP, which includes public comment Site-specific NEPA is done at the time of drilling for well site location & mitigation measures

Letter: 1723 (pg 37), you use the figure 0 1 mile but on page 30 you use the figure of 3 miles Which is correct?

Response: On page 30 - 3 horizontal drilled locations Page 37 is 1 average for all drilled sites

Letter: 1723 (pg 38), you say vertical well pads will be 3 5 acres but on pages 30 and 32 you say 1 5 acres Which is it?

Response: Vertical well pads can range up to 3 5, but average 1 5 acres

Letter: 1723 (pg 39), by the time the notice of APD occurs it is too late to stop the well The only option is where to drill

Response Correct Decision to make available to drill is made at leasing time

Letter: 1723 (pg 41), the NEPA process is too late in the process since the lease has already occurred and the decision to allow drilling or not is already made

Response NEPA, to drill is covered with the FP Site-specific NEPA is done at time of drilling

Letter: 1723 (pg 26-28) you ignore the fragmentation effects of the past and present drilling

Response: The Revised EIS reflects your concerns

Letter: 1723 (pg 29) you try to minimize the impacts by saying that overall negative environmental effects will be minimal

Response: Cumulative impacts are currently addressed in the Revised EIS

Letter: 1723 (pg 30) your figure of 1 5 acres for the pad for vertically drilled wells seems very low to me In the past in the NF the pads have been on the order of 2 5-4 acres in size You are trying to minimize the impacts by estimating pad size so low

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 30-3

EIS Appendix C

Response: These are valid estimates based on actual sites on NFGT

Letter: 1723 (pg 31), there are no beneficial environmental impacts when you drill a well Please list all the positive environmental impacts that drilling a well has in a mature forest stand

Response: Openings of the kind & variety developed for drill pads have been used for species such as Eastern Wild Turkey

Issue: 30-4

EIS Appendix D

Letter: 1723 we are the western most extent of the Eastern Deciduous Forest It is important that we keep the evolution of eastern species at their geographical range extent intact with wilderness This is called site specific variances and is not a negative as you imply

Letter: 1723 Big Creek-- support the designation of all 6767 acres of Big Creek as a Wilderness Area

Letter: 1723 Big Slough--I support the addition of the full 1138 acres to Big Slough Wilderness Area

Letter: 1723 Boggy Creek--the FS has pushed to lease for oil and gas all potential wilderness areas wilderness study was biased for hunting since it was done during the hunting season

Letter: 1723 Chambers Ferry--the 95% harvested area is deceiving most cuts have been thinning

Letter: 1723 Harmon Creek--undergrowth is not bad for wilderness

Letter: 1723 Little Lake Creek--I support including the 691 acres I do not support horseback riding in this wilderness .

Letter: 1723 Longleaf Ridge--the Sierra Club does not support wilderness designations for this area, a National Conservation and Recreation Area makes more sense.

Letter: 1723 Stark Tract--you are being subjective here

Letter: 1723 Turkey Hill--I support the 152 acre addition

Letter: 1723 Winters Bayou--there are sensitive species there are still opportunities for solitude and serenity and quiet this is no place for horses

Letter: 1723 (pg 108, DEIS) I am opposed to you leaving out the West and East Forks of the San Jacinto River, Caney Creek, Little Lake Creek, and Big Creek

Response: Comment noted

Letter: 1604 The DEIS includes some pros and cons as to why each Roadless Area might be wilderness, but not as to why each area should be a special area In the alternative as to each, designate it as one or the other category of special area

Response: Proposed special areas & developed roadless areas were proposed separately, except those proposed special areas that were formally proposed in RARE II

Letter: 1723 you continually do not address how to make wilderness proposals acceptable or compatible with Congressional intent You simply disqualify without a good analysis of how such proposals could be made to be acceptable for wilderness Your analysis therefore is incomplete and not acceptable

Response: All roadless proposals are evaluated by a standard set of criteria that has been established by DOI since RARE I

Letter: 1723 On page 3, it is not demands you should talk about but needs How much wilderness do we need Demands are wishes that should not necessarily be met

Response. You're right. That is part of the criteria for evaluation. Everyone makes demands & that certainly doesn't mean they are needed. It is the objective of the Planning effort to review demand & need and develop a range of alternatives that address these concerns

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 30-4

EIS Appendix D

Letter: 1723 On page 4 a big deal about NF wilderness areas duplicating other existing wilderness areas Congress has not said that just because similar ecosystems are already protected under the National Wilderness Preservation System that others should not also be protected

Response: These are just statements of facts If they were different from existing, then that might be cause for higher consideration

Letter: 1723 You do not list all wilderness options that were considered in the past listed Caney Creek North, Caney Creek South, and Patroon Bayou as possible wilderness sites Yet these are not mentioned in your discussion of post possible wilderness areas

Response: Caney Creek North & South had been eliminated from the list early in evaluation Chambers Ferry & Patroon Bayou are the same

Letter. 1723 (pg 4) contrary to the impression you leave, that Congress has not decided that not buying mineral rights bars a wilderness from being designated this is not a reason to bar or disqualify an area as being potential wilderness

Response. Not necessarily by itself, but it is definitely a consideration to be evaluated with other factors

Letter. 1723 (pg 4) your road mileage is too restrictive Congress has overridden the FS in the past and has allowed roads to go through wilderness why are you being more restrictive?

Response: Following the Wilderness Attribute Rating System, all areas were given the same rating system

Letter 1723 (pg 5) you are contradictory with the ESA You say that you use it as a criteria but at the same time say you have decided that the RCW should be drawn out of wilderness elsewhere in this plan RCW you have already said is not a problem because you will draw it out of wilderness there are no ESA problems in wilderness

Response. Many aspects of 1200 meter zone mgmt would not be feasible in wilderness

Letter: 1723 On page 6, Table D-1, what do wilderness areas in adjoining states have to do with whether there is wilderness potential in the Texas NFs? foolish notion that has no basis in fact especially since Texas NFs have only about 6% set aside while the national average is 18% Where is the equity?

Response Broadbase planning does not necessarily have state boundaries Government ownership in TX is considerably lower percentage wise than in western states where larger percentage of state is in Gov ownership Thereby, presenting better opportunities to set aside areas that meet wilderness attributes

Letter 1723 On page 7, Table D-2, you add the ESA as a criteria when it is not a criteria found in the FS Handbook and you have noted will be drawn out of the wildernesses in TX This is rigging the analysis to make it seem like areas are not appropriate for wilderness

Response. Management for ES is an important factor to consider Some designation, i.e. Wilderness, RNA, Scenic Area, etc would be counter to necessary mgmt to maintain Endangered Species

Letter. 1723 Big Woods--why does not the FS manage for a natural looking stand (plantations), the Lone Star Hiking Trail needs to be designated but is not currently a National Recreation Trail

Response Not sure what stands are being referred to Private land sometimes inhibits natural looking mgmt

Letter 1723 Bounds Peninsula--undergrowth is not bad for wilderness but part of the ecosystem you do not need trail in wilderness

Response: That's true This is just another statement of fact concerning one of the criteria

Letter. 1723 Four Notch-- the RRD has 102,000 acres of land that provides opportunities for primitive recreation but elsewhere you say the only real primitive recreation is in wilderness and that there is a relatively small amount of semi-primitive recreation, you are contradicting yourself here

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 30-4

EIS Appendix D

Response: Almost all NF land may provide a visitor a primitive experience depending upon their base of reference

Letter: 1723 Graham Creek--RCW can be drawn out of wilderness Upland Island is a wilderness with roads running through it wilderness study was biased

Response: Our Recreation Opportunity Spectrum evaluation, maps, areas of different opportunities, are based on certain criteria Primitive under ROS is mostly a mgmt objective, i e wilderness, even though we all know some are close to or can even have roads going through them

Letter: 1723 Indian Mounds--the map makes no sense since you propose to add acreage that will make it hard to be a wilderness you do not propose an alternative that minimizes potential confounding wilderness management factors

Response: The proposals are not FS proposals These are proposals by the public that are being evaluated

Letter: 1723 Jordan Creek--all mineral rights can be acquired, midstory trees do not need to be moved completely from RCW

Response: The law provides for acquisition of mineral rights It is however, highly unlikely that congress would provide the finding

Letter: 1604 The EIS splits its coverage of roadless areas (App D) and Special Areas The maps for roadless areas are often imprecise and hard to read Inadequacies in the maps of roadless areas include failure to indicate clear boundaries of the Stark Tract and the proposed 410-acre addition to Winters Bayou, and continuing to indicate in white (private) the areas that the FS has acquired in wildernesses such as Upland Island (EIS still calls it "Graham Creek") and Indian Mounds

Response: Improvements to maps & identification of Special Areas on Plan maps have been made Maps are to provide general information of location, more specific maps, USFS ownership, etc can be viewed on maps maintained at the S O

Letter: 1723 Alabama Creek--if clearcutting mimics natural disturbances then how can it be considered a negative in any assessment of wilderness potential define what "no significant areas where no timber has been removed" define "improved road"

Response. Clearcutting is one of the standard criteria developed by DOI for Rare I, this concern relates to total timber resource & extend of removals Improved roads are those described in FEIS App E

Issue: 30-5

EIS Appendix E

Letter: 1723 several rivers that should have been included or moved forward in the process were not The East and West Forks of the San Jacinto River and Caney Creek in SHNF [and] Big Creek Little Lake Creek in the Little Lake Creek Wilderness Area

Letter: 1723 No cutting, as mentioned before, in the wild, scenic, or recreation river corridor must be allowed only exception would be hazard trees in imminent danger of falling in an area often frequented by people

Letter: 1723 On page 27, Ayish Bayou, what does "adjacent to the bayou" mean? You do not acknowledge that there are sensitive plants along the bayou as pointed out in the Wilderness Appendix

Letter: 1723 On page 29, Segment 3, Neches River, you do not promote the old growth vegetation that is here excellent wood duck habitat

Response. Comment noted

Letter: 1723 you utilize criteria that are not appropriate for judging many of the rivers
Appendix-k page 214

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 30-5

EIS Appendix E

Letter: 1723 The criteria used on pg 22-25 are not measurable how do you determine whether something has local significance recreationally? How do you define wildlife populations under Wildlife Values? How do you determine if "vegetation, water, and color all contribute to create exemplary visual features". Why no criteria for solitude and quiet?

Response: Criteria were established by DOI, and NPS and are used throughout the country for evaluation of candidate streams

Letter: 1723 Some of your criteria are so strict that no river would qualify in East Texas

Response. The criteria for WSR's was established by the DOI and NPS

Letter: 1723 On page 28, McGee Bend, Angelina River, canoeing can be done what does "wildlife locally common to the forest" mean here? .say it is not free flowing drains the area below Sam Rayburn Dam, if it drains then the water is moving and you cannot say it is not freeflowing

Response. Angelina River segment around McGee Bend is not free flowing, it is backwater from the outlet flow at Sam Rayburn Dam and the rest of the river All of Angelina river below Sam Rayburn is controlled by outlet of Dam.

Letter. 1723 On page 31, Segment 4, Neches River, ignore the OG bottoms

Letter: 1723 On page 34, Segment 1, Neches River, you ignore the OG bottoms

Response: Don't have a good definition for OG It means different things to different people Geologic criteria is required

Letter 1723 On page 33, Cochinnu Bayou, geologic criteria are not appropriate

Letter: 1723 On page 35, Segment 2, Neches River, geologic is not an appropriate criteria to use

Letter. 1723 On page 38, Tarkington Bayou, geological criteria are not appropriate here

Letter. 1723 On page 39, geological criteria for Winters Bayou is inappropriate I have seen a Canebrake Rattlesnake here you do not mention

Response. Geologic criteris is a required rating

Letter: 1723 On page 37, Henry Lake Branch, what does moderately scenic mean? There are large magnolias along this river and many scenic beaver dams

Response: Relatively speaking, low moderate and high, Henry Lake Branch would be moderate

Letter: 1723 apparently not all segments were visited and given the more detailed scrutiny that the 11 segments that SFASU did This biases the review

Response: Some of the 26 rivers were eliminated from further study because of low flow rates, obatructions such as culverts, reservoir influence or other effects that would influence their eligibility

Letter: 1723 the FS talks about how the Canoe Trail at Big Slough Wilderness Area is difficult to canoe because of debris that has fallen into the water But there is no discussion that the FS can take hand tools into the Wilderness and keep the canoe trail open or have volunteers do this There is also no discussion of whether if the canoe trail is too difficult to keep open whether there should be a canoe trail at all if the FS can allow trail maintenance on the Lone Star Hiking Trail in Little Lake Creek Wilderness Area then why cannot the same be done for the canoe trail

Response: Hiking Trails in wilderness have been maintained by volunteers There have been no volunteers for maintaining the canoe trail in wilderness It is prohibitively expensive to provide salaried FS personnel to do this work There are higher priorities with the limited funds & personnel

Letter: 1723 I am concerned about greentree reservoirs because they flood habitat that is wetlands and is a productive as it can be and cannot be improved

Response: Actually, the areas flooded may not technically be wetlands They will provide waterfowl habitat for a 3 month period

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 30-5 EIS Appendix E

Letter: 1723 On page 25, Attoyac River, define what is moderately scenic How did you determine this? What does susceptible to intensive timber management practices mean? What does relatively navigable mean?

Response: Low, moderate, & high are relative terms that are used along with professional judgement

Letter: 1723 I am opposed "manage the timber resource within this corridor to enhance values such as recreation and wildlife " This leaves things wide open for cutting in what must be a protected riparian area do not believe you can improve the habitat for wildlife and certainly not for recreation by cutting

Response: Can not find statement referred to Plan 8, 10, 11, 12, 20, 41, and 42 indicate or specify just the opposite

Issue: 30-6 EIS Appendix F

Letter: 1723 (pg 10 Exhibit A) if you have to estimate the numbers and distribution of reproductive individuals and determine if they are well distributed then you need to do more than monitor BOR

Letter: 1723 (pg 12) these are proposed regulations and have not been adopted This gives you some ability to be innovative and do a really complete job

Response. Comment noted

Letter: 1723 (pg 11) you need to say that you are working to reintroduce the Louisiana Black Bear and Red Wolf

Response: This is a TPWD decision We will work with TPWD in any efforts to reintroduce extirpated species

Letter: 1723 I have a real problem with the indicator section On 11-18-94 at the Wilderness Conference in Santa Fe, NM Dave Graber said the key questions were, What do we measure? and what is the relationship between the indicator and what it is supposed to indicate? These questions have not been answered in this section the only (thing) that is listed is Exhibit E, a two page list of indicator species There is zero discussion about what the indicators are supposed to indicate

Response. Many concerns have been addressed in the revised MI Tables The MI process identifies the steps & rationale for MI development All MI's are keyed to a specific habitat group or seral stage as explained in the Appendix

Letter. 1723 (pg 3) you list that population trends of management indicators but then you do not even say that you will be able to determine the population levels of species or even try. In exhibit E you list a lot of species monitored via element of occurrence This just tells you whether you found a certain species in a certain area It does not tell you what the population of the species is or what the trends of that population is or what the relationships to habitat changes are you have a monitoring situation that violates the FS own federal regulations of what you must do

Letter: 1723 Exhibit B - there is no real discussion of specifically what criteria were used to pick MI other endangered

Response. The process record for MI are extensive The Appendix explains the steps & direction for MI, but records of the many meetings & coordination with Federal, State, University & other professionals are on file & may be viewed at the SO

Letter: 1723 (pg 3) you also call for flexibility in monitoring but what you really need is a specific protocol for monitoring This protocol must be able to catch downward or upward trends in populations Habitat conditions is too nebulous a term to use to be able to tell how a species is doing You are guaranteeing that you will not be able to tell how populations are really doing with the proposed system

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 30-6

EIS Appendix F

Response. Monitoring elements are explained in the Plan, chapter V. The degree of monitoring is based on use, T&E species receive more intensive activity while more common species received extensive monitoring action.

Letter: 1723 (pg 4) you did not invite the public to give input as to what species they would like to see monitored. You give no explanation as to why certain species were chosen. Therefore your reasoning for your choices are not clear.

Response: Public comments & proposals related to MI have been solicited, received, & utilized in the planning revision process since 1990.

Letter: 1723 (pg 8) it appears as if you are ignoring state listed species and also Texas Organization for Endangered Species listed species.

Response: All state listed species were evaluated during the MI process.

Letter: 1723 (2621 1 #5) I do not see where this has been done and documented. You need to include boundaries. Will these be larger than compartments or the same and if the same why so?

Response: See steps 1-4 of the MI selection process, App F.

Letter: 1723 (2621 3 #1) Has this been done? You need to explain how you did this and why you chose the boundaries you did.

Response: See EIS App B.

Letter: 1723 (2621 3 #3) I do not see this addressed for indicator species.

Response: This information is in the computer analysis of the Alternatives & was utilized to describe effects in EIS, Chapter III.

Letter: 1723 (2621 4) where are the habitat components required by the MI and the mitigation measures needed to protect the MI from plan activities?

Response: See revised MI table.

Letter: 1723 (2623 #1) I call this the carrying capacity. Where are these figures? I see some population figures under Exhibit E but no discussion on how they were derived and whether they are sufficient to establish well distributed populations.

Response: Habitat capability & carrying capacity are 2 different concepts. Plan App F describes the process, details are found within the MI process record.

Letter: 1723 (pg 38-39) the Bay Shrub wetlands is not just found as an inclusion in LLP areas. I have found them in the San Jacinto RD in compartment 90. There are zero LLP in these areas. The reality is again that EOR cannot tell you viability, population estimates or even distribution figures.

Response: The MI identification of baygalls was not developed to exclude this from areas other than Longleaf-Little Bluestem landscapes, but rather a way to indicate their importance as a microsite within that landscape.

Issue: 30-7

EIS Appendix G

Letter: 1723 I am concerned that areas that qualify for RNA were turned down.

Response: All areas recommended for RNA status by the review committee have been assigned to MA-8a, Research Natural Areas, in this revision.

Letter: 1723 (pg 13 & 15) remove ATV use from Boykin Springs and Trout Creek. These are incompatible uses that destroy resources.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 30-7 EIS Appendix G

Response: The statements you refer to are statements of fact ATV use does occur in these areas

Issue: 30-8 EIS Appendix H

Letter: 1723 (pg 2) Quarterman and Keever also found that the climax for the Southern Region, which includes most of the Texas NF's was Southern Mixed Hardwood Forests. The names that you are giving here to various plant communities denote mostly subclimax or disclimax communities. Mixed hardwoods are the dominant species. In the Van Lear and Jones paper these are called hardwood site types versus management/successional types. ...you are proposing to manage for earlier successional types at the expense of later successional types which are more hardwood dominated.

Response: Comment noted

Letter: 1723 (pg 3) I could not find the citation of Walker and Baker in the bibliography at the back of App H. It is also important that the reconstruction of historical vegetation using old land surveys and other methods be done as soon as possible and in the interim decisions are not made which make commitments that contradict and keep the results of the vegetative reconstruction from being implemented when finalized.

Response: Appendix H has been edited & issues corrected

Letter: 1723 (pg 9) there is no discussion of other disturbances other than SPB and what amount of acres they affected and still do affect Texas NF's. An average amount of NF land affected by each type of disturbance needs to be given for each average year. This then puts natural disturbance factors and their overall importance into context.

Response: See EIS, chapter III for added discussion of disturbance factors

Letter: 1723 (pg 35) you under estimate the OG age of Loblolly Pines and hardwoods in the Loblolly-Oak Series. As mentioned before in these comments Loblollies can get up to 250-300 years in age. I have never heard of an Upland Dry-Mesic Forest. You cannot combine two different moisture types which is what you have done by combining dry with mesic, which denotes intermediate moisture content.

Response: This description is based on a national effort coordinated by TNC, the combination of these types identifies the similarity of the 2 types from a habitat standpoint. Dry & xeric & mesic have been separated within habitat groups for the mgmt indicators.

Issue: 30-9 EIS Appendix I

Issue: 30-10 EIS Appendix J

Issue: 40-1 Plan Appendix A

Letter: 1723 (pg 26) I am concerned about too little sampling being done to verify the tentative models
Appendix-k page 218

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 40-1

Plan Appendix A

Letter: 1723 It seems like what you are advocating with the ECS and the App H & I is a method for allowing and justifying type conversion so you can say that scientifically this is okay I do not favor type conversion that leads away from the vegetation type that would normally dominate the site

Response: Comment noted

Letter: 1723 (pg 1) the discussion of EM is so general that the present forest plan could be argued to adhere to this the Regional Ecosystem Classification Team apparently has not finished the Ecological Classification Mapping and Inventory System Or has it? This not clear? there has been no formal public input period What will be done in the interim to ensure that commitments that violate the new system are not made?

Letter: 1723 (pg 3) what additional information is needed on Texas NFs? How is it expected to help modify the ECS as presently envisioned? When will the public get a chance to have input and review for this system, the system set out in this appendix has no inclusions policy I am opposed to leaving to districts in the landtype and landtype phase unit the responsibility for determining what is an inclusion The map of each ecological land landscape with land units must be checked by the FS for accuracy with help for TPWD, USFWS, and the interested public

Response: ECS is a continually developing & improvement effort as more information is gained, clearer identification of ECS components will be described Numerous state, federal, and university personnel, as well as organizations and individuals have provided information Your input is also welcome

Letter: 1723 (pg 7) you ignore the San Jacinto River's influence in the San Jacinto RD and Raven RD of the SHNP Southwestern Gulf Flatwoods Subsection, why are there no numbers for precipitation

Letter: 1723 (pg 13-20) if you have several LTA's that cross NF's how will you ensure that they are managed consistently? why do you not know if the Sweetbay Magnolia Series lives in Sandy Uplands This should be determinable When will you do this?

Letter: 1723 (pg 21-22) you keep saying Southwestern Loblolly-Hardwood Subsection but this is not listed on page 11 Why?

Letter: 1723 Table 2, how can a landtype, which is supposed to be larger than a landtype phase be smaller as shown under the Map Scale/Size line? Also you do not explain the words and phrases used Please place a legend here so I can figure this table out

Letter: 1723 Table 3, the fire frequency is not given with years of fire it seems to me that the Big Thicket and San Jacinto should be very low and if so why do you plan to manage these areas with fire frequencies 2-5 or 3-5 years on the uplands which is a frequent occurrence and not very infrequent like the table says

Response: The table has been corrected.

Letter: 1723 (pg 22) San Jacinto Flatwoods The hardwoods here are very aggressive due to the moisture and soil conditions LLP I do not believe can make it in this compartment due to poor drainage and hardwood competition You need to make this adjustment so you do not try to grow something where it does not belong

Response: These decisions will be made on a site specific basis

Letter: 1723 (pg 24) under Big Thicket LTA you ignore hardwoods exist along creeks and slopes in very recognizable communities You need to list these as plant communities too!

Response: These are small components that will be described at the Landtype phase

Issue: 40-2

Plan Appendix B

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 40-2 Plan Appendix B

Letter: 1723 (pg 2) you need a map to show where roads are, which will be reconstructed, what is their class now, which Ranger District they are in, what is the mileage and surface, what are the road speeds, etc In other words you need to show the cumulative impacts now

Response: Access needs for any given area are based on a site-specific analysis taking into account a variety of resource needs, constraints, and environmental factors as outlined in the S&G for the appropriate MAS TSL, reconstruction needs, mitigating measures, and locations for all transportation facilities are determined at that time Most reconstruction work will involve minor reconstruction as defined in EIS Chapter III, Part II(a), utilizing existing routes with Forest-wide S&G applied to minimize effects on the resources

Issue: 40-3 Plan Appendix C

Letter: 1723 (Pg 2, 1) compartments must not be the cutting planning unit These are not ecologically based Watersheds should be the planning unit

Response: Ecological land type was the break for MAs 1 and 2 The compartment boundaries were used as an approximate boundary for purposes of modeling (estimation are within +5%) Site specific boundary will be determined on site during project implementation

Letter: 1723 (Stage 3, 2) you do not protect all areas that are sensitive

Response: All areas that are not suitable for timber management have been excluded from MAs 1 and 2 S&G will be used to insure protections of resources such as MA-1-16, MA-1-62, MA-1-78, MA-2-16, MA-2-62 and MA-2-78

Letter: 1723 (Stage 3, 3) I am not in favor of thinning hardwoods since you will destroy many by salvage

Response: Hardwood thinning in MA-2 is for purpose of RCW management, see MA-2-156, MA-2-157, MA-2-158, and MA-2-159 Also, in treatment for SPB, hardwoods may be cut, see FW-074

Letter: 1723 (4 , Table 1) where are the physically unsuitable acres You do not have a map to identify them on the NF they exist on The same holds for 5 , irreversible damage likely and not restockable within 5 yrs Where are these?

Response: Lands physically unsuitable for timber production are on the Sam Houston NF, within compartments 46 & 48, along East Sandy River Existing stands are hardwood Note, should be 203-13, not 213-3

Letter: 1723 (Table 5) bottomland area should not be grazed and should be put under 3 Land Withdrawn from Forage Production

Response: Historically, grazing has been important to the area, but demand for grazing is decreasing See Plan, Chapter II, Mix of Goods and Service Issue Range Therefore, with the demand decreasing, the amount of bottomland acres used for grazing will become minimal on the forest Most of the bottomland acres for the preferred alternative are within MA-4 Monitoring of the livestock grazing will take place and the cattle will be restricted, controlled or excluded if evidence of degradation occurs Also, within MA-4, there will be no supplemental livestock feeding nor salt/mineral blocks Bottomland acres by management area MA-1-6028 acres-grazing permitted, but with de-emphasize MA-2-7520 acres-grazing permitted, but with de-emphasize MA-4-38353 acres-area closely monitored and restricted if evidence of degradation occurs MA7-5525 acres-grazing discouraged MA-8-3497 acres-not suitable. MA-9-696 acres-not suitable MA-10-206 acres-not suitable

Letter: 1723 (Table 6) you plan to cut up SHNF the most It appears as if you will cut too much bottom and potential OG with this proposal

Response: Only 13,548 acres of bottomland are within MA 1 and 2, therefore on a 120 year planned rotation, this will be a little more than 100 acres a year NF wide Of this total, only 3989 acres are on the Sam Houston, therefore less than 35 acres are estimated to be cut each annually Also, with acres being approximately the same for the Davy Crockett, Sabine and Sam Houston NFs, how did you calculate that the Sam Houston NF will be cut up the most?

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 40-4 Plan Appendix D

Letter: 1723 you need to list and protect the Texas Organization for Endangered Species listed species On page 3 the FS needs to work on documenting the Southeastern Myotis the Canebrake Rattlesnake ought to be more than a Watch species On page 4 Nodding Nixie has been found on the Sam Houston NF You also need to include Southern Crane fly, Green Reins, and Southern Twayblade Orchids because they are adversely impacted by timbering activities

Response: State & Federal agencies, university and USF resource personnel, as well as public comments were used in developing this list It will be updated on at least an annual basis Your input is appreciated

Issue: 40-5 Plan Appendix E

Letter: 1723 (pg 3) I am totally against adding 200 more miles of ORV trail to SHNF The present trails are not up to trail standard and the FS does not have the law enforcement and personnel to adequately police the area for violations

Response: Comment noted

Letter: 1723 (pg 4) I am against the upgrading of all forest roads You need to close roads and not add more and improve them In addition you need to do an EIS on the proposal to designate and upgrade the roads on pages 4-5 as Forest Highways. What will be the impacts on wildlife and the environment?

Letter: 1723 (pg 1) projected demand should not play a role It must be need and environmental damage and what has occurred in the past Can the area be maintained to standards? What about the loss of solitude and quiet? Where is carrying capacity?

Response: All USFS projects are evaluated on a site specific basis to include impact assessment on the human environment

Letter: 1723 (pg 2) I oppose Kelly Campground construction because you cannot control ORV use and it has been severely abused already I opposed Cagle because of the RCW colony there I also oppose Tarkington Bayou because the isolation and solitude and quiet of this place will be destroyed by a developed campground here why is the Lone Star Hiking Trail given only a medium rating and priority?

Response: These rankings were based on a number of factors that can be reviewed in the LMP process record

Issue: 40-6 Plan Appendix F

Letter: 1723 FW-185 refer(s) to Appendix F but then you do not explain what the soil compaction limits mean and how they were derived the limits are not soil or NF specific

Response: The standard has been clarified The tables listed are based on significant research & process record information, you are welcome to review this material in the SO

Issue: 40-7 Plan Appendix G

Letter: 1723 2f, I do not accept the medium rating because ORV trails are still eroding and still not up to trail standards
Appendix-k page 221

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 40-7 Plan Appendix G

Letter: 1723 It seems to me that you admit that BM cannot be adequately monitored via 4g, 1b, 1c, and 3a with the ratings that are given For BM to work the whole plan depends on the columns to all be filled out and be accurate

Letter: 1723 2d, unacceptable conflicts, your monitoring is pathetic Most people do not write They leave an area and do not come back when there is a conflict Your whole proposal here does not make sense

Letter: 1723 4c I doubt you will have the high precision and reliability that is stated to tell about species diversity since there are not enough biologists to do this monitoring

Letter: 1723 4g It is worrisome that you have such low precision and reliability to tell if fire is improving the ecosystem

Letter: 1723 5d a statewide monitoring network will not tell you if air meets NAAQS in the NF's You need monitoring in the forest It is also of concern that you have a low precision and reliability of telling if ozone is hurting vegetation This is not acceptable

Response: Comment noted

Letter: 1723 many times there are no real measurements or the measurements are too general (Appendix G 1b, 1c, 3a, 3i, 4g, and 5d)

Letter: 1723 4a what is the difference between moderate and medium?

Letter: 1723 4b the precision and reliability is low to determine if hunting hurts nongame species How can you do better?

Letter: 1723 5a who will sample for water quality?

Response: The M&E table has been changed to reflect this

Letter: 1723 3c, what kind of sample surveys will you perform?

Response: Acres of Ecosystem restored through landscape level (GAP) type analysis & species surveys on the site

Letter: 1723 1a) there are no criteria Why?

Response: This table has been corrected to reflect your concern

Issue: 40-8 Plan Appendix H

Issue: 99 Other

Letter: 1437 as president of the SJCFEA, I would like to inform you that myself, along with the other officers and directors have reviewed Mr Vann's [letter #1767] letter and we do agree with and support his concerns and recommendations set forth in the letter Please give these matters additional consideration in your revision of the management plan

Response: Comment noted

PLAN AND RIS COMMENTS
Comments by Issue and Response

Issue: 99

Other

Letter: 75 We must protect our natural resources for our children and their children

Letter: 79 We need to save what is left for the future with cautious management

Response: Trees, like all living things, do not live forever. When a stand is regenerated new seedlings can become established and the baby trees begin the cycle over again. Trees planted in 1920 are now 60 years old, stands regenerated in 1950 will be 60 years old in 2010, stands regenerated in 1990 will be 60 years old in 2050, and etc. Regeneration ensures today's forests will be here tomorrow. All timber harvest levels in the alternatives of the FBIS are at sustainable levels that do not impair the long term productivity of the land in accordance with Section 6 (3)(E) of the RPA of 1974 as amended.

Letter: 69 I would like to see an annual statement of the percentage of NF land in Texas that has been converted to even-age pine plantation

Response: Approximately 22,000 acres of already existing even-aged pine stands have been regenerated since 1987. However, there have been no conversions to even-aged pine stands during that period nor are there any planned in this revision.

Issue: 99-1

Not in the Scope of the Plan

Letter: 4 Our state forests are what make our lands so naturally fulfilled

Letter: 118 Salvage cutting in Wilderness Areas affected by the southern pine beetle will not achieve Charles Wilson's "expressed" goal of protecting nearby private timber

Letter: 151 Until we get a handle on over population, every effort must be made to protect our natural resources

Letter: 221 Recent frenzied deforestation of second growth mixed forest in one of the small NFS compartments near my home has had a devastating impact on wild creatures that once lived there. Now all destroyed by an insane system of subsidized and institutionalized deforestation, partly supported by banks, congress, law enforcement, and universities.

Letter: 231 The FS couldn't manage a 1/2 acre watermelon patch

Letter: 259 The FS as a whole has done a dismal job of managing our country's forests - redwoods harvested for a bunch of stupid picnic tables & wood for Japan! Future generations will be denied the benefits of so much because of the current slant toward the business interests.

Letter: 319 Like you and other timber product users I consume my share. I am willing, however, to buy used furniture, recycled paper products and to separate my garbage everyday so that fewer trees can be cut.

Letter: 389 I hope you drive south from Kountze to Beaumont and just see how many trees have been cut - It's a SHAME! Where are our birds going to nest?

Letter: 565 Help us protect our environment. Things that are done to damage it can seldom be undone.

Letter: 1165 I encourage any effort which aims to reduce our reliance on forest products.

Letter: 1636 If Gifford Pinchot were alive today he would probably be laughing and crying at the same time over the effort you are having to put into planning.

Letter: 1660 Can we please just use common sense here? Protect this Earth - it's the only one we've got!

Letter: 1663 I live next to NF land and would like to see as much as possible that the land be left wild.

Letter: 1670 Internal paperwork and mailings should be on double-sided copies.

Letter: 1670 The dishonesty of the USFS is appalling.

Letter: 1670 Sell the National Forests--but not the wilderness--to private companies and we can all find something else to do.

Letter: 1781 We, my family, own timber land in Louisiana, where we take great care of the environment. Surely, such care should also be taken by land belonging to the nation - especially as an example to the private sector.

Response: Comment noted

Letter: 280 Please do not destroy my children's heritage. Leave nature alone.

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 99-1 Not in the Scope of the Plan

Letter: 1138 Please make an effort to save the forest for my daughter and her generation

Letter: 1143 it is important to conserve our natural resources.

Response: See EIS appendix B for constraints used with all alternatives. These constraints insure that timber harvest levels are at sustainable levels that do not impair the long term productivity of the land. This is in accordance with Section 4 of the MUSYA of 1960.

Letter: 624 Tourism in NF lands is increasing. I'm sure the communities in the area will benefit just as much by protecting our resource (not logging corporations).

Response: The FS strives to maintain NFGT benefiting all mankind. Tourists come to the NFGT for many reasons - camping, swimming, boating, hiking, fishing, hunting or just to relax. The EIS and Plan look at these areas and, while not addressing tourists directly, attempts to provide NFGT everyone can enjoy.

Letter: 862 It is time we stopped giving away our natural resources without protection for wildlife and plant communities. It is not our right as human beings to destroy our environment to get the commodities we want.

Letter: 1329 I don't understand the forest services catering primarily to the greedy interests of lumber people and not preserving our heritage with thoughtful and careful management.

Response: Timber sales are a "tool" used to protect, perpetuate, and improve our NF resources. Trees are harvested for many reasons - to create, maintain or improve the health of timber stands, to create, maintain, or improve desirable wildlife habitat, to prevent or control the infestation of insects, disease, windstorms, and fire, and for other reasons. For example, timber sales are used to improve the habitat of the RCW. Using timber sales, tens of thousands of acres of the habitat have been thinned to be more desirable and some of the monies from the timber sales receipts were used to further improve the habitat by controlling undesirable mid-story vegetation, by installing artificial cavities in trees, etc. The NFGT do not have a "below cost" timber sale program. Our comprehensive accounting records show the NFGT have not had a "below cost" timber sale program since we started keeping such records. In FY 1994, the NFGT received more than \$15 million in revenue from timber sales, and just spent about \$5 million on timber sales and all the other costs associated with timber sales. The net revenue to the U.S. Government from the timber sale program was about \$10 million. The timber sale program on the NFGT generated about \$2.86 for every \$1.00 of tax dollars spent during the FY.

Letter: 1310 Roads are ubiquitous on private lands, in cities, in rural areas, everywhere. Public lands are the one place where it is possible to not have so many roads. It makes no sense to honeycomb public lands with roads also.

Response: With State, County, and FS routes, a transportation system is in place that meets access needs into most areas of the Forest. This system will, however, require some reconstruction to meet expected use needs with the majority of the reconstruction involving minor work as defined in EIS Chapter III, Part II(a) utilizing existing routes. The FS road system must meet not only the access needs for resource production, but must also provide access for a wide variety of other uses and needs including recreation, mineral exploration, special uses as well as taking into consideration the mobility needs of people with disabilities.

Letter: 1167 I urge that the NF&Gs in Tx be designated as a National Natural Preserve and Wilderness, and with NO development activities, NO logging and roads, with the Preserve to include 2,094,750 acres and the Wilderness to include 837,900 acres.

Letter: 1181 philosophy of the USFS is long overdue in changing from that of a business in which the great American deity, MONEY, is worshipped to a philosophy of gratitude, honor & respect, love for what nature put here.

Letter: 1310 The FS should request to the Congress that the method of payments to local counties and schools be changed.

Letter: 1310 FS payments to counties and schools should be based on acreage, not on income.

Letter: 1310 Reduce the bureaucracy and the budgets for all these areas (grazing, wildlife, campgrounds, timber). Increase the budget for law enforcement and land acquisition. Save the taxpayers a few million dollars a year.

Letter: 1310 tried to help get appropriations under the Land and Water Conservation Fund for certain land acquisitions. Congress just doesn't seem to be cooperating. It should be possible to shuttle some money from other budgets to get the parcels identified as of highest priority.

PLAN AND HIS COMMENTS
Comments by Issue and Response

Issue 99-1

Not in the Scope of the Plan

- Letter.** 1611 I propose 1) the USFS support repeal of the KV Act In lieu of the act's all sales of timber from NF be ceased 2) That each USFS unit be totally funded by line item with no funds coming from local sales, or operation or management of the NF 3) That all sales, concessions, use fees, etc , on NF lands go directly into the general federal treasury Each NF would stand alone with respect to funding
- Letter:** 1611 I propose that 1) all cutting, hauling, trimming, salvage, etc done for scientific reasons be done solely by NF employees and with the oversight of the research division of the USFS That there be no contracts with local providers that would profit directly from timber management decisions Even fuel expenses should be purchased outside of the county to avoid any dependence by the community on cutting activity on the NF 2) That all FS staff be reviewed for possible conflicts of interest with relationships with local timber companies and private businesses who currently do business with the Service
- Letter:** 1611 I propose that 1) no tree is cut for the purpose of profit for anyone on NF lands Trees cut for beetle control, thinning, fire control, or other scientific purposes be used solely for the use of the FS for building, construction, erosion control, or other non-fund enhancement use 2) That a special committee that includes representatives from the research branch of the FS be empaneled prior to the cutting of any tree on the NF, to approve the final cutting and tree disposition plan Consideration should be given to inclusion of non-forest service and non-timber industry persons from the community that can help the FS move from the "crop" approach to the "museum" approach Perhaps a museum curator might be a good choice 3) That bio-diversity be the order of the day

Response: Comment noted, though this is really a congressional-interest item

- Letter.** 194 I think that fund sharing to the county, schools etc should be on an acreage or some other method, possibly including resources from user fees etc as long as fund sharing is from commodity production only, forest resources will (be) over utilized

Response:

Payments to counties are based on the revenue from each Forest Revenue payments to each county are based on the percent of the Forest occupying a specific county land Any other means needs congressional action

- Letter:** 221 When the NFS acquired east Texas land there were a few acres of original Big Thicket wilderness left that they could have saved for future generations but chose not to

Response: The Big Thicket is part of the NPS The NFGT is not involved with management of Park Service lands

- Letter:** 187 As I sit here reading the information provided to me by the Sierra Club, I wonder about the future I'm sure you are not interested in the musings/ thoughts of a 35 year old Mom But, I'd like you to consider that all the actions you take, specifically in this land management and generally, in what the U S government citizens do greatly effect what will occur in the future and globally Too often we react in the short term rather than think of how our choices will relate in the long terms We need to think about the future, what will be left for our children
- Letter:** 240 Can't anyone see what our prize forests will look like say hundred years from now A few jobs and money can never replace these National Forest
- Letter:** 266 Please allow the "National Wood Farm" to become a "National Forest" once again
- Letter:** 318 citizens of Texas CARE about our natural resources They belong to us and not only those who stand to profit from them
- Letter:** 563 Please help us use our resources wisely This is so important for our children's sake
- Letter:** 594 We have so little untouched wilderness left please do your best to protect all of our natural resources
- Letter:** 653 too much emphasis on today's consumption and too little on saving for tomorrow's citizens
- Letter:** 844 please consider our future generations
- Letter:** 845 The public derives its value of the land when it is left alone
- Letter:** 852 It's extremely important in day & age that we provide good stewardship
- Letter:** 853 If the earth continues to be destroyed we will look like Mars
- Letter:** 884 irreversible damage has been done we have to begin to respect the finite resources God has blessed us with, TODAY
- Letter:** 1501 My husband, three sons, and I are all avid bird-watchers, hikers, hunters, and native Texans We look forward to many years of enjoyment in Texas' forests Please help protect them for us and for those to come

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 99-1

Not in the Scope of the Plan

Response: Trees, like all living things, do not live forever. When a stand is regenerated new seedlings can become established and the baby trees begin the cycle over again. Trees planted in 1920 are now 60 years old, stands regenerated in 1950 will be 60 years old in 2010, stands regenerated in 1990 will be 60 years old in 2050, and etc. Regeneration ensures today's forests will be here tomorrow. All timber harvest levels in the alternatives of the FEIS are at sustainable levels that do not impair the long term productivity of the land in accordance with Section 6 (3)(E) of the RPA of 1974 as amended.

Letter: 70 Our national forests, deserve preservation

Letter: 74 Commodity production is an out-dated practice. Public lands should be managed for recreational and aesthetic benefits

Letter: 90 I do not believe that timber cutting should be allowed in National Forests

Letter: 95 I think there should be no cutting in the National Forests

Letter: 181 I would prefer even more stringent protection of the ecosystems effected, where ever I go I try to visit the natural parks & preserves and I always come away understanding the precious nature of these areas

Letter: 184 Cherish or perish. Please help us in this process of individual and collective responsibility

Letter: 198 We need to start saving the land and trees to have new National Park, State Park or Natural Areas

Letter: 225 If we can't have beauty and peace and quiet in a park, then we should give them all to the greedy Big Money Guys

Letter: 249 As a long time resident of East Texas I grew to appreciate these forests and feel strongly that no trees should be cut in our NFs

Letter: 328 I am totally depressed and angered by the destruction of our national forest. Please do something to stop the desecration of our national resources

Letter: 333 so much of Texas' most beautiful lands are still in private hands. So the precious few public lands we have must be protected. When I see the unnecessary wholesale cutting in the forests, it makes me feel that we are regressing in our understanding of ecosystems

Letter: 360 It's time to start managing our NF as true forest and not special interest tree farms

Letter: 569 The USFS should protect at all costs, our natural environment which, if not preserved NOW will continue to deteriorate until there is nothing left to protect

Letter: 572 We need to protect the wildlife keep the streams clean and make it where all ages of people can enjoy camping, back packing or just setting and enjoying the beauty

Letter: 841 need our help in preserving the land and its wildlife

Letter: 846 help us preserve what we've got now

Letter: 847 Please be a responsible supervisor and good steward of the land

Letter: 850 I personally believe that NFs should not be used for timber harvest at all - there's plenty timber company private land for that

Letter: 956 We must do everything possible to preserve the beauty of our state

Letter: 982 I oppose any timber cutting in our National Forests

Letter: 1080 Multiple uses such as harvesting and recreation have a place, but only secondarily to preservation

Letter: 1089 In my opinion NO cutting should be allowed for commercial use in our NFs!

Letter: 1113 I've always felt that the FS was implemented to "protect" this resource, not to capitalize on it

Letter: 1265 now is the time for emphasis to shift from revenue production to protection

Letter: 1357 I know what a valuable resource the forest are in Texas. I would hate to see them or any forest damaged anymore than they already have been

Letter: 1506 Why is it I have to write so many of these letters, OUTRAGED that the people that we entrust to make the right decisions, seem to ignore what is self evidently the RIGHT decision & pursue a path that prospers a few corporations. lookout for the best interest of the forest! For us & our children, I don't want to take my kids to see a TREE FARM, where once there was a forest

Letter: 1616 It is time to redefine the reason for being for the Forest Service. If not then change the name to National Timber Management Service. How can it be a forest service if the current practices are causing biodiversity loss, soil erosion and water pollution in our National Forests in Texas?

Letter: 1669 We need a change in Forest Management. If I'm not mistaken, the tax payers pay you peoples salary. So act like you're supposed to & protect the forest

Letter: 1726 There is little in the way of natural recreational opportunity in Houston except for the nearby forests. They should be preserved!

Letter: 1749 I live and own land in a county where we have seen huge sections of forest developed by get-rich-quick realty schemes. I am really fed up with the emphasis on harvesting, rather than protecting the few parcels of protected (so-called) land left - called our National Forests and Grasslands

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 99-1

Not in the Scope of the Plan

Response: One of the purposes of the FS is to supply timber NF are managed for renewable and non-renewable resources which include " but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values without impairment of the productivity of the land " (FLPMA Section 103 (c)) National parks and monuments were created to preserve There is no commodity production in a National Park The NFGT are part of the FS, not the NPS

Letter: 106 Let's remember that we're a first world country-and first world countries don't export raw products

Letter: 532 I object to the present shipment of our natural beauty to be cut and shipped to Japan for homes to a civilization that has in the past caused bloodshed and the present trade deficit

Letter: 1579 And quit furnishing them (timber) to foreign countries - I don't understand the economics of "trade" so say to heck with sending our trees out of the country

Response: We are unaware of any unprocessed logs from the NFGT being exported

Letter: 156 I have seen the timber cutting and hauling in the mountains of New Mexico, north of Taos in dead winter FS graders and bulldozers were keeping forest roads open losing money by selling our assets This happens here in Texas also

Response: Our comprehensive accounting records show the NFGT have not had a "below cost" timber sale program since we started keeping such records In FY 1994, the NFGT received more than \$15 million in revenue from timber sales, just spent about \$5 million on timber sales and all the other costs associated with timber sales The net revenue to the US Government from the timber sale program was about \$10 million The timber sale program on the NFGT generated about \$2 86 for every \$1 00 of tax dollars spent during the FY

Letter: 192 Please think of our CHILDREN'S future - we need to protect our resources and use them carefully

Letter: 256 I wish to be able to continue to enjoy our NFs and hope that future generations may do so

Response: NFs are managed in accordance with MUSYA principles Appendix B of the EIS details the analysis for the timber harvest levels for each alternative

Letter: 1679 The Draft FP does not address grazing fees rates Rates should be set comparable to fees on private land

Response: Congress controls grazing fees

Letter: 335 I want to thank you for getting things started and on the road to open dialogue It appears we finally are getting someone to listen to the varied needs of users and then try to accommodate all of our varied interests and still maintain some form of sanity in the utilization of our heritage I am taking this couple of minutes to tell you guys THANKS Now don't get all swell headed, we are not on the same page yet, but we are at least in the same song book Please let your subordinates know that I appreciate their efforts Keep up the good work

Response: The IDT appreciates your support

Letter: 1125 Under no circumstances will I ever vote for a candidate or an administrative agency promoting clearcutting of NF lands

Response: Recent direction from the Chief limited clearcutting on NFS lands to areas where it is essential to meet FP objectives and where particular circumstances require it The selected alternative incorporates this direction while providing that regeneration cutting methods be determined on a site-specific basis

Letter: 1266 There is very little public lands in Texas We believe these lands were set aside as National public lands to insure intact forested ecosystem remain

Letter: 1302 Somewhere and now we must begin proper management for the benefit of future generations In 200 years we have destroyed 50% of our rural environment Now is the time to begin saving the balance thru proper management

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 99-1 Not in the Scope of the Plan

Response: NPs are managed for renewable and nonrenewable resources which include "but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values without impairment of the productivity of the land " in accordance with FLEMA Section 103 (c)

Letter: 1658 At one time I knew & enjoyed & loved that forest (Sam Houston NF) & all the others very much However the way you have changed it to a near pine plantation, following the footstep of the timber company treatment of their land, is pretty sick I am against any timber cutting in our national forests

Response: The NPT does not manage for pine monocultures but for longleaf pine, xeric and dry-mesic oak pine, mixed loblolly-hardwood, mesic hardwood and bottomland hardwood communities These are described in detail in Chapter III Part I(a) of the EIS The effects of each alternative are analyzed in the same section

Letter: 993 The plan, as written, is so difficult to read and follow that at times I have suspected that you were trying to play a big trick on all us Sierra Club and "the like" by producing a big cloud of VERBAL SMOKE I feel certain that I could do almost anything within the guidelines and definitions that you have published

Response: The FP is an implementation guide for the selected alternative It is to be used by people with a working knowledge of forestry and the mission of the NPT

Letter: 1126 The developer in my area bulldozed his entire parcel before building It has taken the residents of our area 20 years to provide modest growth for the wild creatures who once lived in our area How long will it take you to restore the entire ecosystem of the East Texas Piney Woods?

Response:

The development to which you refer occurred on private land NPT does not interfere with the management of private land However, humans and their land uses are a part of the ecosystem The entire ecosystem of ETX includes cities, farms, and man made lakes, such as Lake Sam Rayburn The NPT can only manage for ecosystems that occur naturally on FS land

Letter: 1441 The new office at Apple Springs is ample space, and conveniently located for all employees - the necessary practices can be accomplished from this hub

Letter: 1442 I am concerned with the possibility of the office here being moved to Ratcliff

Letter: 1569 I would like to take this opportunity to let you know what an important part of the (Apple Springs) community you (Trinity) District is and hope it will continue to be a vital part of our town

Letter: 1624 It is our understanding there is a possibility of turning the work center (Trinity RD) into a visitor information center only We sincerely hope this does NOT happen

Letter: 1750 As a citizen of Apple Springs I feel the FS is very important to our community We should not have to depend on someone from Ratcliff to assist us

Response:

Office location is not a FP decision, but a political one Your letter was forwarded to the FS for response

Letter: 638 It is a disgrace that our national government is so poorly run that we have to still deplete our national resources

PLAN AND EIS COMMENTS
Comments by Issue and Response

Issue: 99-1

Not in the Scope of the Plan

Response: The NFMA of 1976 requires that the FS "provide for multiple use and sustained yield of the products and services obtained there from in accordance with the MUSYA of 1960, and in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness, and determine for management systems, harvesting levels, and procedures." Timber sales are a "tool" used to protect, perpetuate, and improve our NF resources. Trees are harvested for many reasons: to maintain or improve the health of timber stands, to create, maintain or improve the health of timber stands, to create, maintain, or improve desirable wildlife habitat, to prevent or control the infestation of insects, disease, windstorms, and fire, and for other reasons. For example, timber sales are used to improve the habitat of the RCW. Using timber sales, tens of thousands of acres of the habitat have been thinned to be more desirable and some of the monies from the timber sales receipts were used to further improve the habitat by controlling undesirable mid-story vegetation, by installing artificial cavities in trees, etc. See app B for constraints used that ensure renewable resources are available in perpetuity.

Letter: 1594 Look and read how many deserts are being made today by too rapid cutting and burning of forests all over the world.

Response: The NFT has no control of the management of forested land that is not within NFT boundaries.

Letter: 1776 I would suggest the FS use less expensive paper when printing up these documents. I do not see this quality of paper used in corporate America.

Response: The paper is purchased through GSA contracts which are awarded to the lowest responding bidder for that fiscal year.

Letter: 1310 It appears that the FS has done here what it does with its timber program. First it decides how it wants to manage the timber and then it tries to force everything else to fit in a mold that melds with the timber plan. Here the FS, with already too many roads, decides to build more and then tampers with the definitions in the ROS classes to make them fit in with the road building program. You can't honestly call recreation semi-primitive when you're only a quarter-mile away from a road.

Response: The Glossary has been changed to clarify your concern, the true distance is 1/2 mile.

Letter: 1310 Probably it's impossible to provide primitive recreation any more on the TNF's, but the FS should strive to provide opportunities as close to that definition as possible, rather than following its present course of building more and more roads and continually degrading the recreation experiences for remoteness and solitude. This is inequitable and unfair. Why should one set of forest users be catered to exclusively?

Response: Each mgmt area has a defined VQO & ROS objective, many which offer semi-primitive non-motorized recreation. These objectives allow us to provide recreationally a "full" spectrum on the NFGT.

Letter: 1648 USFS spending will need to show a direct benefit to the taxpayer. Any commodity production, leases or grazing will have to be at market rates, show no net loss of tax dollars, and not create unfair competition for local providers. How can local timber growers currently compete with the USFS? How about a landowner who could lease grazing rights if it wasn't so much cheaper in the national forest? Local governments are going to suffer during these changes unless we move to a payment in lieu of taxes that does not depend on factors related to commodity production of USFS activity.

Response: Costs & benefits are fully documented for NFGT use, the actual estimates are part of FEIS App B. The system of payment used by the NFGT is directed through legislation, any change in payment method would have to be mandated.

Letter: 604 I have to pay forty dollars a year in order for my two four wheelers to be legal on forest trails. No hiker or camper, as far as I know, must meet this requirement. Included in the permit fees are road and bridge fees and we are not allowed to ride on either.

Response: That is a state regulation. The state legislature passed laws requiring the use of all ORV's to be regulated on all public land.

This completes the
Comment & Response Section
of Appendix-K

The following 16 pages
are letters from
Federal/State Agencies
and Elected Officials



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JAN 9 1995

Mr. Robert Joslin, Regional Forester
Southern Region
U.S. Forest Service
1720 Peachtree Road NW, Ste. 951
Atlanta, GA 30367-9102

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Dear Mr. Joslin:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality Regulations for Implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 8 office in Dallas, Texas has completed its review of the U.S. Forest Service's Draft Environmental Impact Statement (DEIS) for revising the Land and Resource Management Plan for the National Forests and Grasslands in Texas (NFGT). The NFGT consists of the Angeline, Davy Crockett, Sabine, and Sam Houston National Forests in east Texas and the Caddo and Lyndon B. Johnson National Grasslands in north central Texas. There are approximately 837,000 National Forest acres in 12 counties and 38,100 acres of National Grasslands in 3 counties.

In addition to the No Action alternative, the DEIS analyzes the effects of eight action alternatives that propose to address forest plan objectives such as: a balance of natural values with timber production and market commodities; improvement of riparian and wildlife habitat, maintenance and improvement of threatened and endangered species habitat, emphasis on recreation, special areas, and urban forests, etc.

EPA offers the following comments for your consideration in development of the Final Environmental Impact Statement (FEIS).

PROPOSED ALTERNATIVE

The U.S. Forest Service (USFS) preferred alternative (Alternative 4b) proposes to emphasize corridors between red-cockaded woodpecker (RCW) habitat management areas. We concur with the USFS's determination that Alternative 4b establishes a fair balance in meeting the economic needs of the various forest and grassland users and local counties, while providing for the protection of RCW and other natural values. In addition, this alternative supports the stated objectives of the NFGT Revised Forest Plan.

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AFFECTED ENVIRONMENT AND ENVIRONMENTAL EFFECTS

We found the affected environment to be well described. However, the scale of the maps provided with the DEIS to define the management areas and each of the features within the project area and the proposed improvements. We suggest that either the scale of the maps in the FEIS be adjusted to facilitate the identification of natural and proposed features within the project area, or the current maps be further refined and additional relevant features be labeled.

SOUTHERN PINE BEETLE CONTROL

We recommend that a summarization of the control actions and standards specified in the 1987 Southern Pine Beetle Control EIS be provided in the FEIS for the benefit of readers. We found too much emphasis in the DEIS on the incorporation by reference to the other three regional programmatic documents (the Southern Pine Beetle, Vegetation Management, and Red-Cockaded Woodpecker EISs) without the benefit of discussing decisions made as a result of these environmental analyses.

CUMULATIVE IMPACTS

Limited discussions on cumulative impacts for some resources are scattered throughout the document. A summary of all cumulative impacts listed by affected resources could be presented separately for the benefit of readers.

EPA DEIS RATING

EPA rates this proposed action/DEIS as "LO," i.e., EPA has "Lack of Objections." Our classification will be published in the Federal Register according to our responsibility under Section 309 of the Clean Air Act, to inform the public of our views on proposed Federal actions.

We appreciate the opportunity to review the DEIS. We request that you send our office two (2) copies of the FEIS at the same time that it is sent to the Office of Federal Activities, EPA, 401 M Street S.W., Washington, DC 20460.

Sincerely yours,

Reynolds
for Jane N. Baginaw
Regional Administrator

Printed on Recycled Paper

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Stephen F. Austin State University

P O Box 6109, SFA Station • Nacogdoches, Texas 75962 6109
(409) 468-3304 • FAX (409) 468-2489



College of Forestry
Office of the Dean

December 8, 1994

Forest Supervisor
National Forests and Grasslands
U S Forest Service
701 North First Street
Lufkin, TX 75901

Dear Mr Newman

The purpose of my letter is to provide comments on the Forest Plan Draft
Environmental Impact Statement

I have the following concerns about the preferred alternative 4(b)

- 1 I am concerned that such a large proportion of national forest acreage is devoted to single species management (RCW) at a time when more emphasis is being placed in biodiversity I believe that it is inevitable that the current, and soon to be revised, RCW Management Guidelines will be repudiated as too restrictive and limited in terms of habitat diversity The exception, I believe, will be longleaf pine/bluestem ecosystems
- 2 The preferred Alternative 4b will not provide for much early successional habitat which is critical for many of the neotropical migratory birds More should be done to address the habitat needs of such species
- 3 Ecosystem management as described in the Draft EIS is, in many respects, very labor intensive There will be increased needs for various types of expertise and for a labor force to implement the management strategies It does not appear that funding levels will be sufficient to permit the U S Forest Service to do all that will be needed to implement alternative 4b

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Forest Supervisor
Page 2
December 8, 1994

Although I have concerns about the preferred alternative, I am aware of the current pressures on the U S Forest Service to manage public lands for RCW and to implement ecosystem management. I applaud your efforts to restore longleaf pine ecosystems in the region

Sincerely,

R. Scott Beasley
Dean, College of Forestry

RSB/jw



TEXAS HISTORICAL COMMISSION
P.O. BOX 12276 AUSTIN TEXAS 78711 2276 (TELEPHONE) 512 461 6096 (FAX) 512-463 6095 (RELAY TX) 1 800 735 2989 (TDD)
DEPARTMENT OF ANTIQUITIES PROTECTION

November 28, 1994

Alan G. Newman
Forest Supervisor
U.S. Department of Agriculture, Forest Service
National Forests in Texas
701 N. 1st Street
Lufkin, Texas 75901

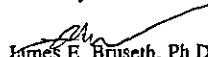
Re Comments on the Draft Revised Land and Resources Management Plan and Draft Environmental Impact Statement for the Revised Land and Management Resource Management Plan (FS, F2)

Dear Mr. Newman

Thank you for allowing us to review and comment on the above referenced documents. Overall, we believe that proposed plans for considering cultural resources should result in the protection and enhancement of these resources. Our specific comments are enclosed.

If we may be of further assistance, please contact Mr. Bill Martin of our staff at 512/463-5867.


Sincerely,


James E. Bruseeth, Ph.D.
Deputy State Historic Preservation Officer

JEB/TKP/wam

Enclosure

Sincerely,


Timothy K. Perittula, Ph.D.
Assistant Director for Antiquities Review

The State Agency for Historic Preservation

Comments on:
Draft Revised Land and Resource Management Plan and Draft Environmental Impact Statement for the Revised Land and Resource Management Plan, USDA Forest Service, National Forests and Grasslands in Texas

Draft Environmental Impact Statement for the Revised Land and Resource Management Plan

GENERAL

This office believes that EIS Alternative 4b, the alternative preferred by the National Forests and Grasslands in Texas, does not offer as much protection to areas with a high probability for containing historic properties as do Alternatives 6 and 7.

SPECIFIC

Issue 1 Biodiversity

Alternatives 6 and 7 both greatly increase the width of the streamside and bottomland zones that are kept free from timber harvesting. Although this management practice is primarily intended to increase biodiversity, it also will serve to protect historic properties, since these zones have the highest potential for containing archeological sites.

Issue 3 Special Management Areas

Alternatives 6 and 7 both have the greatest number of Special Management Areas where impacts of all kinds, including those from recreation, are strictly controlled. Again, by removing more areas from potential impacts, historic properties will fare better than under other alternatives. Under the FS/SHPO Heritage Management Plan, additional historic management areas are proposed, which we believe should be considered to enhance cultural resource protection on the forests.

Issue 4 Off-Road Vehicles (ORVs)

In our opinion, Alternative 6, which prohibits all ORV use, offers the best protection for cultural resources. ORVs used in an off-trail setting during wet conditions can create serious ruts which damage shallow archeological deposits. Alternative 7, which eliminates open use of ORVs and confines such use to a trail system, may be a more realistic compromise, since people who own ORVs are going to go somewhere to use them. At least there is some degree of control of their use under Alternative 7.

Issue 10 Recreation

Alternatives 6 and 7 will require an increase in the construction of horse trails. This work will require cultural resources surveys that follow the stipulations of the R8-PA, the MOU, and the Heritage Management Plan.

Issues 14 and 15 Lands and Minerals

Alternative 6, which eliminates leasing land for mineral exploration, would prevent any impacts to cultural resources from oil and gas exploration on Forest Service lands. However, since the overall impacts to cultural resources on the National Forests and Grasslands in Texas has been relatively minor in the past, eliminating such exploration may be unnecessary. Alternative 7, which simply decreases lands available for leasing, may be a more reasonable alternative.

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Draft Revised Land and Resource Management Plan

SPECIFIC

p. 60. Cultural Resources. FW-041 through FW-046, which outline the cultural resource inventory and evaluation process, follow directly from consultation regarding the R8-PA, the MOU, and the Heritage Management Program. Overall, we concur with the wording, but believe FW-045 should be clarified. Currently, it reads:

FW-045 Conduct comprehensive cultural resource inventories on areas not surveyed as part of site-specific analysis.

This statement is too broad and fails to reflect that thought has gone into the selection of areas that will be surveyed. The statement should note that these surveys will follow the compartment prioritization plan described in the Heritage Management Plan. This would clarify that only certain areas considered to have a high potential for containing historic properties will be surveyed.

p. 67. Lands. FW-082 permits temporary group events on National Forest lands. Please note that all activities by such groups should be limited to areas that do not contain significant cultural resources. The use of the forest by the Rainbow People in 1992 led to damage as a result of digging latrines on an important historic site.

FW-142 calls for ORV use to be limited to prevent damage to natural resources. We would wish to include cultural resources.

P. 89. MA-1-52 calls for allowing ORV use both on and off permanently marked trails. We believe that ORVs can damage archeological sites and urge the Forest Service to limit their use to marked trails.

p. 119. Recreation Management. MA-3-74 calls for the development of shooting facilities on the grasslands and limiting firearms use to such facilities except for shotguns and blackpowder arms used for hunting. We urge the Forest Service to proceed with construction of such a facility on the LBJ National Grasslands, where recreational shooting in a gully has led to partial destruction of a lime kiln site that we believe is eligible for inclusion in the National Register of Historic Places.

p. 151. Research Natural Areas. MA-8a-11 reads:

An inventory of cultural resources is needed only if sites are located and determined to be significant to understanding the cultural past.

This statement is not consistent with the MOU and Heritage Management Plan. Under the terms of the Heritage Management Plan, Research Natural Areas would be surveyed whenever they fall within the compartments selected for intensive survey.

p. 191. Special Riparian and Wildlife Areas

MA-8c-03 directs that historical and cultural characteristics be protected through boundary definition and signing. Studies have shown that signing actually increases vandalism of archeological sites. We recommend that sites be recorded and protected, but not marked with signs.

pp. 192-194. Archeological and Historical Areas. Overall, the standards set forth for the protection of cultural resources seem to adequate. However, for some standards, it is not clear who will be taking the lead or when some of these actions are planned. For instance, MA-8f-42 states that the

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FS will acquire private holdings to enhance the value of these special areas and MA-8f-61 states that the FS will negotiate for the purchase of reserved mineral rights to protect cultural resources from the exercise of these rights. We believe that these standards could enhance cultural resources and should be pursued. Will the Forest Archeologist be responsible for initiating these actions through the land acquisition department?

p. 195. The plans to restore the Lake Fannin Organizational Camp to its original state fall along the lines of the on-site discussion held between the FS and SHPO on November 9.

pp. 196-197. The Attoyac Bayou, Ayish Bayou, and Cochino Bayou Archeological Areas. We support the plan to protect these areas from timber practices and mineral extraction that might affect sites. As the Heritage Management Program proceeds, and additional clusters of sites are found along other drainages, similar special management areas should be defined to protect them.

p. 214. Administrative Use Sites. MA-10a-21 states that an inventory of cultural resources will be completed prior to ground disturbing practices. This statement should be revised to include evaluation of inventoried resources in consultation with the SHPO. Section 106 responsibilities cannot be completed simply by inventorying the resources.

p. 237 (Table 1) Monitoring Questions. The questions proposed for monitoring implementation, effectiveness, and validation of the Heritage Management Plan are appropriate, but who will be doing the monitoring and how often? The final version of the Heritage Management Plan should specifically address this issue.



**TEXAS
PARKS AND WILDLIFE DEPARTMENT**
4200 Smith School Road • Austin, Texas 78744 • 512-389-4800

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ANDREW SANSON
Executive Director

COMMISSIONERS

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December 14, 1994

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Ft. Worth

Mr. Alan G. Newman
Forest Supervisor
National Forests and Grasslands in Texas
701 North First Street
Lufkin, TX 75901

Dear Mr. Newman

This letter responds to the Draft Revised Land and Resource Management Plan for the National Forests & Grasslands in Texas and associated Draft Environmental Impact Statement. The Texas Parks and Wildlife Department appreciates the opportunity to review these documents. It is evident that the U.S. Forest Service has expended a large amount of time and effort in compiling the data and information contained in these documents and attached appendices. A wide array of resource issues and management scenarios have been identified in an attempt to develop and implement a management plan that will adequately address resource needs and satisfy public demand. This Department is encouraged by the Forest Service's efforts toward principles of ecosystem management in the current plan. The adoption of a forest-wide vegetation classification and your efforts to develop and refine the Ecological Classification System (ECS) for the National Forests in Texas are commendable. Forest management should provide for desired future conditions to mimic habitats that enhance overall ecosystem health. Whatever management alternative is ultimately selected, this Department strongly encourages options which will allow flexibility in management so that changes can be adopted as new information from the ECS becomes available. Specific concerns and comments relative to development and implementation of the Management Plan are attached.

After much discussion with your staff concerning the designation of the Longleaf Ridge as a "National Wildlife and Recreation Area," the following clarification of the Department's position is offered. This area should receive special management consideration to achieve the following goals: 1) maintain the existence of large core colonies of red-cockaded woodpeckers, 2) enhance the integrity and quality of the occurring longleaf-pine-little blue stem vegetation

Mr. Allen G. Newman
Page 2
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1671
2 of 7
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series and associated wildlife habitat components, 3) provide allowance for proactive management practices to include prescribed fire, mechanical, and chemical vegetation control; and 4) provide public recreational opportunities to include hunting. When this Department proposed the designation as a "National Wildlife and Recreation Area," it was our understanding that these goals would not be assured unless such a designation was made. If the plan can be amended to assure these goals, then this Department would not object to whatever name or management area designation is allocated for these purposes.

I want to extend our appreciation to the Service for promptly and graciously responding to our numerous requests for information and meetings for which there have been many. We would not have been able to develop this response without this assistance.

Sincerely,

Andrew Sansom
Andrew Sansom
Executive Director

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Attachments

1671
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Attachment

Alternative 4b, the preferred plan by the U.S. Forest Service (USFS) appears to possess attributes that achieve a balance between the other currently existing alternatives. The plan optimizes management for the red-cockaded woodpecker by allocating approximately 50 percent of the National Forests and Grasslands in Texas to this purpose. However, this alternative or any other selected should incorporate the following additional considerations:

Prescribed Burning:

Because fire is/was such a driving force to the southern pine ecosystem, prescribed fire should be available as a management tool. The USFS needs more fire management flexibility than permitted in the Final Environmental Impact Statement (FEIS) for Vegetation Management in the Coastal Plain/Piedmont published in January, 1989. New concepts concerning ecosystem management have surfaced since this FEIS was written. For example, the Vegetation Management FEIS should be amended to allow for greater scorch heights and increased fire frequencies, as well as more latitude in applying growing season burns. If fire is to be used as a tool for effectively restoring and maintaining healthy fire climax ecosystems, then they will have to be much hotter than fires of the past. For restoration purposes, it is useless to burn unless the fire is hot enough to control living vegetation, rather than just reducing on-the-ground fuels. Perhaps there should be a system developed to measure the effectiveness of burns in terms of the desired result, rather than the number of acres burned per year.

Also, in order to manage and burn on an ecosystem scale, it will be important to consolidate management units as much as possible. This concept should be taken into consideration when trying to purchase or exchange land for the National Forest.

With decreasing budgets and personnel limitations, it seems unlikely that the USFS will be able to accomplish the burning projected in this plan. The proposed across-the-board burning cycle is not consistent with ecosystem management. There are some areas that need annual or biannual burns, others probably every 5 years, others every 10 or 15 years, and some probably never. Some of the hardwood areas can never be winter burned except in exceptionally dry years, perhaps they should be burned then. By defining burning cycles by areas or systems, a more reasonable burning work load could be developed.

The Department recommends that plowed fire lanes not be utilized unless this is the only method acceptable. For example, fire should be allowed to burn into Streamside Management Zones (SMZ's). This approach will produce a much more gradual transition between habitat types, and will not produce sharp ecotones.

1671
4 of 7
15-DEC-94
2

Management Indicators:

Accomplishment of the monitoring projected in this plan does not appear practical given anticipated budget and human resource limitations. If a practical way of monitoring the systems cannot be found, then the indicators and monitoring proposals should be reduced to a reasonable load that the USFS can accomplish. Perhaps a solution would be to establish a statement in the Plan linking the desired management indicators to each respective vegetative group. The vegetative group could then be monitored. If the vegetative group is providing high quality habitat, then the management indicators should be healthy and thriving.

Exotic Species:

More clarification should be provided regarding "desirable exotic species." For example, feral hogs should not be considered desirable. The animals are not part of the original ecosystem and are damaging the forest and grasslands in many areas. The Plan or EIS should discuss all the reasons why hogs are or can be a problem and support population control. A statement should include the idea that the immigration of neighboring hogs will continue to be problematic without the understanding and help of adjacent landowners and managers. The Texas Parks and Wildlife Department has the opportunity to be a helpful influence in this matter. Problems with hogs include, but are not limited to: destruction of longleaf seedlings and other regenerating forest plants, damage to endangered species in bogs, competition with other wildlife for mast, possible problems with the reproductive success of ground nesting birds, possible disease vectors, damage to wildlife plantings, and damage to ground dwelling vertebrates such as salamanders or loads (some of which are rare or endangered).

The Plan states that grazing of livestock will be prohibited in Candidate Scenic Recreation River Corridors, in Special Riparian and Wildlife areas, and in Scenic areas. Research Natural Areas permit grazing of livestock only as part of scientific investigations. Grazing of livestock will be discouraged in wilderness areas. Are hogs classified as livestock? They are of domestic sources, they graze, and they root. Rooting is often more damaging than grazing. Since they may be defined as grazing livestock, how are they to be kept out of the restricted areas? They are presently in these areas, or soon will be if their expansion continues.

Forest Roads:

Under the current documentation, the mileage breakdown of temporary vs. permanent roads and new construction vs. old is not clearly defined. Without these figures, it is hard to determine what the cumulative impacts will be. For example, ORV trails placed too close to a bog could negatively impact the hydrology of the bog, while roads placed near RCW cluster sites could negatively affect the success of nesting during the spring. Furthermore, roads have a definite negative impact on snake populations, as observed by the canebrake study conducted by the Southern Forest Experiment Station. Perhaps maps should be developed and made available for our review to better assess the impacts of roads to be upgraded. If this is not feasible, could road maps be included in the project plans so that they can be evaluated on a case-by-case basis? Where uneven age management is applied, measures should be taken to plan and minimize the amount of entries and number of roads into units.

1671
5 of 7
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Ponds:

The Department encourages wetland creation or enhancement projects rather than developing small ponds that are not maintained and have little wildlife value

The validity of constructing one pond per management unit is neither conducive to ecosystem management or to enhancing wetland values. Constructing ponds scattered throughout compartments without an integrated plan for identifying existing wetlands and determining creation, enhancement or restoration opportunities is a costly and unnecessary practice. While water is seldom, if ever, a limiting factor to native wildlife species in east Texas, loss of functioning wetlands with high value has been significant and considerations for this problem should be a part of the overall land management plan.

Streamside Management Zones:

Discussion in the Revised Land & Resource Management Plan and Draft EIS concerning streamside management zones (SMZ's) is not clear in regard to implications for protection of bottomland hardwood forests and riparian vegetation. As indicated by the Service, these zones actually encompass the alluvial bottoms associated with 100 year floodplains in addition to vegetation adjacent to perennial and intermittent streams. These are the areas identified by the Department's Texas Wetlands Plan and in many situations will exceed the Service's minimum parameters of 66 and 100 feet. Additionally, transitional zones between the floodplain areas and uplands serve to protect the integrity of travel corridors. Evaluation and selective incorporation of these areas will also reduce effects of habitat fragmentation, and protect the bottomland corridors from disturbance.

Snags:

According to discussion during a meeting regarding the Plan on 16 November 1994, the Service has proposed a management objective of 12 snags/acre to increase populations of some cavity nesters.

Is there a problem with cavity nesters that this density of snags will alleviate? Twelve snags per acre equals about 18 feet of BA. Since snags have a maximum standing life of about 10 years (usually much less), how can trees be grown fast enough to replace fallen snags and still produce trees for other uses?

Perhaps there should be a statement about how scattered insect-killed trees are salvaged and therefore how scattered snags are managed. The practice of late is to leave scattered pine snags. This is proper except during strong southern pine beetle years. During the hot portions of the southern pine beetle cycle, single infested trees should be removed. But during the cooler portion of the beetle cycle, single infested, killed trees should be left standing. Can this be incorporated as a guide?

1671
6 of 7
15-DEC-94
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Old Growth:

Because of past and proposed management guides for red-cockaded woodpecker, bottomlands, streamside management zones, wilderness, and the 1/4 mile wild and scenic river corridor, many forest stands will be allowed to progress and increase toward old growth status. Development of old growth forests should be optimized in the selected alternative, while keeping the management flexibility to address specific needs of individual stands. As correctly stated in the summary, allowances for old growth will likely have adverse effects on commodity production in the short term, but will increase long-term productivity, overall species richness and viability of less common plant and animal species. The importance of including provisions for old growth in forest management has been stated in previous correspondence by this Department. Old growth or older growth is currently adequately identified in the computer data base. As older stands occur and are located during field surveys, this data base should be updated. The plan should also include provisions for updating the public on where old growth stands are located without referring to a data base. Additionally, the Plan should better reference the 100,000± acres that will be coming into the old-growth category (or 100± years).

Preferred Silvicultural Methods

Appendix J of the EIS identifies three silvicultural systems for managing forests, the even-aged, two-aged, and uneven-aged systems and their associated regeneration methods. Each has been shown to have benefits as well as limitations relative to particular goals. This Department supports using whatever available silvicultural methods best achieve the identified management goals for each of the 11 major land allocations. The U.S. Forest Service is obligated to address resource management issues that will require management considerations ranging from broadly based ecosystem and plant community management to site specific treatment of specific stands, and specific species. These management needs will require the potential use of all available tools. The degree of acceptability or usefulness of each of the three methods will be determined on the precise delineation of the management goal and related objectives.

Uneven-aged management has caught much attention because of its appearance and the notion that it is more natural. However, making it work in the presence of fire and hardwoods will require untried modifications to the system. There is concern that the public, wildlife biologists, and the USFS will not be satisfied with the results of such an attempt.

Another limitation with uneven-aged management is the extreme difficulty of conducting prescribed burning while producing or maintaining regeneration. It will be very difficult, if not impossible to burn effectively and still achieve adequate regeneration under an uneven aged management regime. This should be taken into account when prescribing regeneration cuts to management units. Perhaps irregular shelterwood would better achieve desired regeneration while maintaining the ecosystem in the most natural manner. The red-cockaded woodpecker, Bachman's sparrow, Louisiana pine snake, Texas trailing phlox, and many other T&E or rare species have been directly impacted by fire suppression. The only way these species will be recovered is through an effective burning regime. Herbicides will control woody vegetation, but will not restore the native grasses, forbs, and herbaceous vegetation that were once such an important component of the Pineywoods ecosystem.

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Improved Seedlings:

It is a good policy to have some genetically improved stands scattered throughout the forests, depending on particular genetic selection goals. This does not infer use of non-native species. The vigor of these stands may be greater than many of the degraded "natural stands" whose gene bank came from a few trees along a fence or trees escaping the saw because of phenotypic inferiority.

Wilderness:

The Department recommends that prescribed fire be implemented in wilderness areas. It is also strongly recommended that the Regional Directive be amended to allow for southern pine beetle control within these areas. Southern pine beetle impacts have been dramatic and detrimental to both the wilderness areas and adjacent private lands.

Regeneration:

The pine regeneration figures for loblolly and shortleaf pine are too high. A total of 300 to 400 well spaced seedlings should be enough to adequately regenerate most sites to a pine or pine dominated stand. A density of 600 to 900 seedlings limits the production of herbaceous and shrub vegetation that many wildlife species depend on. The Department recommends that the previous guidelines contained in the FEIS for Vegetation Management in Coastal Plain/Piedmont be amended to allow for a reduction in pine density.

Miscellaneous Comments:

Draft Plan, page 124, MA-4-12. Maintain existing plant communities. This should be clarified. For example, if burning is conducted effectively in longleaf management units, then the baygalls enclosed within will shrink. Is this consistent with the overall goal? Perhaps the standard should be stated as, "Restore and maintain existing plant communities."

Draft Plan, page 91, Rotation Age and Diameter Guidelines Table.

The diameter limits presented will not match the ages needed to attain "old-growth." They also make the use of fire essentially ineffective.

Mineral Recovery:

The forest wide standards for aesthetics should state that oil and gas structures should be placed in previously cleared or disturbed areas and as close to roads as possible in order to minimize impacts and fragmentation.

Heritage Sites:

In appendix B, page 84 of the EIS, there should be explanation that the Plan will manage inclusions such as the Heritage sites as separate from the entire compartment, and will treat them accordingly.

Trinity River Authority of Texas



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December 6, 1994

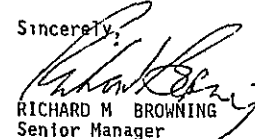
Alan S. Newman, Forest Supervisor
National Forests and
Grasslands in Texas
701 N 1st Street
Lufkin, Texas 75901

Re: Draft EIS - Land and Resource Management Plan

Dear Mr. Newman:

The subject document has been received and reviewed. Though it does not give the exact location of affected tracts or any detail on impacts on water, it appears that all alternatives try to minimize erosion or other disturbances, none would be worse than present conditions, and the leading alternatives would be similar.

Sincerely,


RICHARD M. BROWNING
Senior Manager
Planning & Environmental
Management Division

RMB/ls

PO Box 60
Arlington Texas 76004
Metro (817) 467 4343
TeleFax (817) 465 0970





IN REPLY
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United States Department of the Interior

NATIONAL PARK SERVICE
Big Thicket National Preserve
3785 Milam
Beaumont Texas 77701

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December 14, 1994

Alan G. Newman
Forest Supervisor
National Forests and Grasslands in Texas
701 North First Street
Lufkin, Texas 75901

Dear Mr. Newman

We appreciate the opportunity to comment upon the U.S. Forest Service "Draft Land and Resource Management Plan" and "Draft Environmental Impact Statement". The wealth of information summarized in the documents is a testament to the complex issues the U.S. Forest Service faces in attempting to satisfy many public demands upon the resources of the National Forests and Grasslands in Texas. Overall, the preferred alternative presented in the Plan represents an earnest attempt to integrate traditional multiple-use activities with other resource values of the lands in your stewardship. In this regard, the Plan shows promise for establishing ecosystem-based management. The comments of members of the resource management staff at Big Thicket National Preserve are summarized below.

We realize that the preferred alternative would have short-term impacts upon local economies that are driven by forest product industries and livestock production. However, the establishment of desired future conditions for the forests and rangelands, and the use of increasingly more creative approaches to achieve those conditions would assure the long-term sustainability of natural resources. The Forest Service should make every available effort to educate the public about desired future conditions in its implementation of the preferred alternative. In addition, attempts should be made to identify and promote other non-traditional, sustainable economic uses.

The implementation of the preferred alternative would have indirect beneficial impacts upon the natural resources within Big Thicket National Preserve. The Plan proposes to more effectively protect stream quality in the Upper Neches and Angelina River Basins by expanding the use of streamside protection zones, establishing recreational river corridors, and evaluating streams for inclusion in the National Wild and Scenic Rivers System. While many impacts to stream quality are ameliorated within Lake

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Sam Rayburn and Lake Steinhagen, any measures to improve water quality in the Neches River would benefit the aquatic and wetland ecosystem components within the Neches River Corridor Units of Big Thicket National Preserve. In addition, the implementation of proposed forest management techniques to restore and protect forest diversity would have beneficial effects upon those wildlife species (including endangered species) which mutually use resources within Forest Service and Park Service boundaries as they migrate through East Texas.

We are impressed by the emphasis on protecting biological diversity. The use of the Ecological Classification System, the Management Indicators Table, and the identified Desired Future Conditions appear to be a more effective system for characterizing the range of ecosystem components than have previous systems. The designation of Research Natural Areas and Botanical Areas to protect unique resources, and utilization of research results to better understand the implications of management practices upon the full complement of biological components would enable managers to adapt management strategies if changes are needed. We suspect, however, that some of the areas proposed for inclusion in protected zones should be enlarged in order to enhance their effectiveness and sustainability over longer periods of time.

The proposed use of forest management practices to restore hardwood components and to enhance stand structural and age class diversity would also help sustain the irreplaceable plant and wildlife communities that are unique to East Texas. In addition, the implementation of other restrictions, including excluding logging skids from certain areas, reducing the number of stream crossings during logging operations, protecting turkey roost areas, and retaining snags and hardwood den trees would contribute to these management objectives.

While we understand the reasons that large portions of the National Forests are dedicated to managing for the endangered red-cockaded woodpecker, we encourage the Forest Service to work with the U.S. Fish and Wildlife Service to broaden its objectives to instead manage for dwindling long leaf pine-little bluestem upland forests. The shift in emphasis to provide long-term availability and maintenance of this habitat type would not only enhance the chances of survival for the red-cockaded woodpecker, but also for many other exceedingly rare plant and animal species. The proposed increase in use of prescribed fire, and the shift to planning summer season burns are effective measures to restore and maintain these habitats, as the National Park Service has learned while managing for the same objectives at Big Thicket National Preserve.

We note that proposed changes in management of off-road vehicles would also enhance the protection of many plant and wildlife species and stream quality. Instead of designating areas for unlimited off-road access, detrimental impacts to the flora,

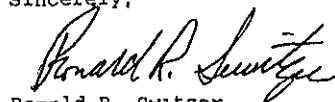
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fauna, soils, and water quality could be minimized by instead establishing a system of trails. If necessary, additional routes could be established in adjacent areas.

Overall, the draft Plan and preferred alternative represent an attempt to derive consensus from a conflicting array of needs and desires of many public constituencies. The flexibility that is built into the Plan is needed in order to allow changes in management as the effects of current approaches are assessed through planned research.

Again, I thank you for the opportunity to comment upon the Draft Plan. The National Park Service would gladly cooperate with the U S Forest Service and other land management entities to develop and implement multi-agency approaches devoted to specific issues in sustainable ecosystem management. If you or any member of your staff wish to further discuss these comments, please contact Ricky Maxey or Rick Strahan at (409) 839-2690.

Sincerely,



Ronald R. Switzer
Superintendent

409/598 3863
Fax 409/598 3148

Floyd A. "Dock" Watson
COUNTY JUDGE - SHELBY COUNTY



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200 San Augustine St.,
Center, Texas 75935

December 14, 1994

Ernie Smith, Area Ranger
National Forests and Grasslands in Texas
701 North First Street
Lufkin, Texas 75904

Dear Mr. Smith:

I would like to endorse Alternative 2 of the Draft Environmental Impact Statement for the Revised Land and Resource Management Plan dated September, 1994. This is the best plan for Shelby County of the other alternatives available. I would hope that we would be more interested in regeneration and reforestation than the habitats which would come naturally with the right cover.

I think the management of National Forest Lands could be managed best by local or area needs rather than national edicts. Most of these changes could be handled in a more economical manner than those required on a national level.

We support you in your efforts to improve the marketable timber in Shelby and surrounding counties and if we can be of further service, please feel free to call on us.

Sincerely,



Floyd A. Watson
County Judge
Shelby County

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United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Post Office Box 649
Albuquerque, New Mexico 87103

ER 94/755

December 19, 1994

Robert Joslin
Regional Forester, Southern Region
1720 Peachtree Road NW Suite 951
Atlanta, Georgia 30367-9102

Dear Mr. Joslin

The U.S. Department of the Interior has reviewed the draft Environmental Impact Statement (EIS) and the Revised Land and Resource Management Plan for the National Forests and Grasslands in Texas. The following comments are provided for your consideration in preparing the final document.

GENERAL COMMENTS

National grassland management provides for water, forage, wildlife habitat, recreation, and minerals. The preferred alternative provides a mix of amenity and commodity output, recognizing urban users' needs and values. Activities include grazing, oil and gas drilling and production, outdoor recreation, and native habitat restoration.

In all alternatives evaluated, grazing activity on the grasslands is expected to remain constant or just below current levels, however, an increase in developed and dispersed recreational opportunities is anticipated. We believe livestock grazing on the grasslands, as proposed, fails to account for species and habitat incompatible with continued pressure from domestic livestock. For example, the woodland and bottomland components on the Caddo and LBJ National Grasslands are not as suitable for grazing as native grasslands and improved pastures. It is estimated that half of the avian species recorded are dependent upon grassland habitat and half are dependent on other habitat types, including water, riparian areas, woodlands, and bottomland hardwoods. Deemphasizing livestock grazing in these areas should be considered.

Alternatives 2 through 7 are consistent with the currently proposed U.S. Forest Service direction to incorporate red-cockaded woodpecker (*Picoides borealis*) (RCW) management into the individual Forest Plans on the 11 National forests in the Southern Region with RCW populations. Alternative 1, the no-action alternative, would continue to manage the National forests in Texas under the court-ordered management plan for 1,200 meter zones for active and inactive RCW clusters. Alternative 1 will not support the RCW in the long term, because it only requires management of existing active and inactive clusters and not adjacent habitat or habitat between demographically isolated clusters. Alternative 1 also lacks adequate regeneration methods for harvesting timber which are expected to provide for a continual flow of mature pine trees required by the RCW for nesting and roosting.

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We support implementation of the preferred Alternative, 4b, as it relates to RCW management and establishment of RCW Habitat Management Areas (HMA's). This alternative provides sufficient habitat to recover the RCW in the coastal plain of east Texas. Establishment and management of the mature pine forest, preferred by the RCW, are expected to provide habitat for an additional 189 Federally-listed species (and several unlisted species) dependent on the mature pine forest. Alternative 4b proposes to establish and manage the second largest amount (71,268 acres) of the rare longleaf-pine/little bluestem plant community. This Alternative includes provisions for identifying (through use of a biologically sound ecological classification system) and managing ecosystems in the National forests of Texas.

Alternative 4b also emphasizes developed recreational opportunities, particularly off-road vehicle (ORV) uses, and mineral leasing on greater than half (398,500 of the 637,000 acres) of the National forests in Texas. This Alternative proposes to build 250 miles of ORV trails on the Sam Houston and Angelina National Forests and will include a total of 355 miles on the four National forests combined (more than any of the other alternatives). The Sam Houston National Forest currently supports recovery of the RCW population. However, the impact to the RCW population on the National forests from development and use of such a large number of ORV trails is unknown and may negatively impact this species. We recommend a reduction in the number of ORV trails by at least half of the proposed amount, and that a study of the impacts of ORV use on the RCW be conducted.

To date the U.S. Forest Service has not determined the cumulative impacts of past, present, and future oil and gas exploration and developments on the RCW, the rare plant communities, particularly the longleaf-pine/little bluestem community, and on the interior forests in each of the National forests in Texas. In order to be in compliance with the National Environmental Policy Act, it is recommended that these impacts be determined, particularly on the Yellowpine Ranger District of the Sabine National Forest, which has undergone extensive oil and gas developments during the past 3 years, and the Angelina National Forest, for which several oil wells are proposed in and adjacent to RCW and bald eagle (*Haliaeetus leucocephalus*) habitat. The findings of the study can then be used to evaluate the extent of future oil and gas activities in the National forests. Cumulative impacts can be determined by calculating the amount of acres of pine, pine/hardwood, and bottomland hardwood stands existing before and after oil and gas activities (from timber stand data), and the acres proposed to be harvested for oil and gas activities (information is included in the draft EIS, Appendix C) on Federal, State, and private lands adjacent to the National forests.

The "desired future condition" (in approximate number of acres) for each plant community and ecosystem should be determined in order to calculate the number of available acres for future oil and gas activities. Alternative 4b, which specifies moderate to high commodity production and low recreation and wildlife management, places a higher priority on mineral leasing in the National forests in Texas than ecosystems management. This Alternative states that "two-thirds of the forest would be set aside for the RCW" (338,637 acres). It appears that the preferred alternative would concentrate mineral leasing on the remainder of the forests (398,500 acres, except in wilderness areas). We are concerned that this management strategy emphasizes mineral leasing to replace lost timber revenue resulting from RCW management. The draft EIS (page 50, issues 14 and 15) states that "the mineral activity with the greatest potential impact to other resources and to the human environment is in the area of oil and gas development." Implementing this strategy may lead to the same destination.

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that past emphasis on timber harvesting has, specifically, the further loss in the amount and quality of the mature forest ecosystem and its associated Federally-listed species. We believe this strategy should be modified and evaluated in regard to the cumulative impacts from past, present, and proposed activities

To date, the National forests in Texas lack information regarding the location, status, and habitat requirements of several Federally-listed species. Fragmentation of forest stands from high commodity production is more likely to negatively impact the RCW, other Federally-listed species, and the integrity of forest ecosystems than the projected amount of forest loss (although total forest loss of plant communities has not been determined). We recommend the National forests in Texas continue to locate wells and pipeline right-of-ways in existing openings and to locate these facilities along major roadways. The U.S. Forest Service, historically, has located wells further into the forest to maintain the visual quality along roadways. However, we believe it is more important to reduce forest fragmentation than to maintain visual quality.

SPECIFIC COMMENTS

Issue 1 Biodiversity, Old Growth, page 29 Alternatives 4, 4a, and 4b propose to locate old growth forests in wilderness areas, special areas, riparian areas, and the 1/4-mile zone around RCW clusters. RCW habitat should not be considered old-growth habitat because, unlike wilderness and special areas, it receives intensive hardwood midstory removal. Additionally, if the U.S. Forest Service plans to manage ecosystems, it is important to establish contiguous old-growth forests. This may be accomplished by designating old-growth forest corridors between riparian, special areas, and wilderness areas. It is recommended that the standard for MA-1 and MA-2 regarding old growth be rewritten to allocate old-growth corridors through RCW habitat management areas if necessary.

Issue 10, Recreation, page 37 For the preferred alternative "five additional recreation sites are proposed on the forest." Many of the developed recreation sites are currently under utilized. In many areas camping loops or entire areas are closed due to nonuse. Additional developed areas would serve to decrease the habitat for some wildlife species; in this regard, we recommend that funds be utilized to improve existing developed recreational areas instead of creating more.

Issue 11, Resource Sustainability, Range Management/Grazing, page 39 The no-action approach provides approximately 38,000 acres for grazing on the National grasslands, "management emphasis will continue at approximate current levels." Total National grassland acreage is 38,100 with an estimated 3,800 acres in bottomland hardwoods, over 9,000 acres in prairie-savanna woodlands, and more than 19,000 acres in prairie grasslands. Proper range management with grazing as one of many management tools is important for the restoration of native grassland habitat beneficial to endemic and migratory wildlife species. However, grazing in bottomland hardwood areas may degrade habitat essential for Federal trust species.

Issue 15, Lands, page 43 Issue 15 is very general and could use a better discussion of the U.S. Forest Service's land acquisition goals. It would also be helpful if there were maps or tables describing the location of proposed land acquisitions.

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Issue 2, Vegetation Manipulation, page 45 Alternative 4b proposes to "prescribe burn" more acres of National forest land than any of the other alternatives. We support this proposal based on the fact that fire is a critical component in fire-dependant ecosystems. However, it is recommended that no restriction be placed on the time interval for conducting prescribed burning (i.e., the 2 to 5 years specified in the draft EIS). More frequent fires may be necessary to convert vegetational communities to the longleaf-pine/little bluestem community.

Issue 8, Community Stability, page 48 This section makes the statement that "Grazing receipts from permittees on the Caddo and LBJ National Grasslands is [are] greatest in Alternatives 1, 2, and 3 and lower in Alternatives 4 through 7, however, this difference is minimal and may be offset by the increase in recreational opportunities in Alternatives 4 through 7." However, on page 36 under the Community Stability section, it states that "Grazing remains consistent to current levels on the Grasslands." Developed recreational facilities, shooting ranges, and special interest areas should decrease available grazing acreage.

Affected Environment and Environmental Consequences, page 52 It is stated, "The effects of alternatives are disclosed with the mitigating measures in place." In relation to fish and wildlife impacts, the first step in mitigation involves avoidance. If impacts cannot be avoided, they should be minimized to the extent possible and unavoidable impacts should be mitigated to restore lost habitat values resulting from a project.

Grassland Grazing and Range Management, page 68 This section states, "The Caddo and LBJ grasslands have a mix of bottomland hardwoods (10 percent), prairie-savanna woodlands (25-35 percent), and prairie grasslands (50-60 percent)." According to these figures, the grasslands comprise approximately 3,800 acres of bottomland hardwoods. Livestock grazing has the potential to degrade wildlife habitat in bottomland hardwood areas through the removal of forbs, shrubs, and regeneration of hardwoods.

Grassland Grazing and Range Management, page 69 It is stated, "It is anticipated that most acreage on the Grasslands would be available for permitted grazing in every alternative, with the exception of special management areas and developed recreation sites. Allotments with a recreational emphasis would not prohibit grazing; however, this emphasis could reduce some use (season of use or intensity of grazing) on the allotment on a site specific basis." We believe that livestock grazing in bottomland hardwood areas (approximately 3,800 acres) should be limited and evaluated in regard to compatibility with wildlife resources. Limited grazing may have no impact, however, exclusion areas should be developed, monitored, and utilized as a basis for future management decisions in bottomland hardwood areas.

Game Species, Affected Environment-Forests and Grasslands, page 92 The importance of increasing the flow of water to the fisheries resource needs to be explained, as well as including information on seasonal flow regimes and how they will be impacted by the proposed alternatives.

Part II(a), Soil Productivity, pages 117-119, and Part II(b), Soil Productivity, pages 165-166 The discussion that soil productivity is low in the National forests and grasslands in Texas is misleading. Soils in these areas are naturally low in potassium and phosphorus, except in bogs and some riparian areas. This discussion leads the reader to believe that forest

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management practices will not affect the soils in the National forests and grasslands in Texas because they are already low in productivity. In fact, timber harvesting continues to reduce soil productivity because the nutrients which are tied up in the trees have been removed, therefore, these trees can no longer contribute to the leaf litter and subsequent detritus build up in the soil and nutrients required by aquatic organisms. This section should be rewritten to reflect the correct perspective.

Part II(a), Environmental Consequences of the Alternatives, Land Uses, page 126 This section states, "valid existing rights may override management objectives" to grant land use authorization permits. A statement should be included here to clarify that endangered species' concerns may take precedence over granting some of these land use permits, an example may be when these authorizations involve a "take" of an endangered or threatened species.

Part II(a), Operation and Maintenance of Roads, Environmental Consequences of the Alternatives (Road Development), pages 128-130 This section of the draft EIS does not specify what the actual density (per acre or per square mile) and location of roads are on the National forests in Texas. The U.S. Forest Service in Texas has stated that they plan to map these roads when their Geographic Information System for this project is installed. The draft EIS should state that this activity is planned and that the information will be available to Federal and State agencies and the private sector. The draft EIS does not include all impacts to the environment from road reconstruction and construction, only impacts to soil and water. It is recommended that the EIS address the impacts of roads fragmented throughout the forest ecosystems.

The Physical Environment, Part II(b), Alternative 4(b), page 155. Due to RCW concerns, available oil and gas activities "will have fewer acres available for surface occupancy." These activities "could effect" RCW's during the nesting season and "may need to be relocated to SPB (southern pine beetle) spots or storm damage areas to avoid damaging additional openings." In all cases, the method which causes the least amount of environmental impacts should be utilized. Any action which may affect any Federally-listed threatened or endangered species should be avoided. Otherwise, section 7 of the Endangered Species Act requires formal consultation with the U.S. Fish and Wildlife Service (FWS).

Glossary, page 235 The definition for filter strip should include a minimum width of relatively undisturbed vegetation to be retained. The silvicultural forestwide standard (FW-171-23) in the Draft Revised Land and Resource Management Plan, chapter IV, page 79, states that the filter "strip's width in feet is at least 30 plus 1.5 times the percent slope." The definition should be consistent with this standard.

Appendix D, Winters Bayou, pages 250-264 Alternative 4b does not include provisions to increase the amount of wilderness acreage. It is recommended that the U.S. Forest Service consider adding Winters Bayou on the Sam Houston National Forest as a wilderness area. This area supports the rare and declining mature bottomland hardwood ecosystem in east Texas. We agree with the use of prescribed fire in Winters Bayou and in existing wilderness areas, as specified in alternatives 2 through 5. Designation of some of the other proposed wilderness areas (i.e., Longleaf Ridge and Jordan Creeks) would conflict with designation and management of proposed RCW HMA's.

Appendix E, Wild and Scenic Rivers, page 2 In order that inherent values may be protected and managed, we support designation of the two segments of the Neches River, identified in the draft EIS, as a National Wild and Scenic River to be included in the National Wild and Scenic River System of Waterways.

Appendix I, pages 1-15 The "desired future condition" regarding snags and dead and down trees for each of the forest types listed in the Appendix, includes a statement that "The high temperature and humidity in east Texas and the recurrent fires prevent large build-ups of snags or down material over large areas." The lack of snags and dead and down material in the National forests in Texas is primarily the result of prescribed burning programs which have not included provisions to protect this important forest component. Several listed candidate species (Rafinesque's big-eared bat, *Plecotus rafinesquii*, Southeastern myotis, *Myotis austroriparius*, and the Louisiana pine snake, *Pituophis melanoleucus ruthveni*) and the U.S. Forest Service's secondary cavity nesting species, depend on snags and dead and down material to meet their habitat requirements. Recent ongoing research indicates that very few of these species inhabit the National forests (and other Federal and State locations) in east Texas. We recommend increasing the current number of snags (0 to approximately 6/acre) and dead and down material/acre (unknown amount) in these National forests by requiring protection of these forest components in the prescribed burning program. Research conducted by Evans and Connor (1979)¹, indicated that 12 snags/acre are required to provide suitable habitat for secondary cavity nesters in southern forests.

DRAFT REVISED LAND AND RESOURCE MANAGEMENT PLAN

General Comments

Language in the standards and guidelines for Management Areas 1 and 2 need to be changed to reflect changes that will be made in the final EIS for management of the red-cockaded woodpecker (RCW) and its habitat on National forests in the southern Region.

Specific Comments

Chapter II, Integrated Pest Management (IPM) Issue, page 11 New techniques, using behavioral chemicals, to control southern-pine beetle (SPB) infestations are being studied and have been successful. SPB infestations have destroyed a significant number of RCW cavity trees in the National forests in Texas (154 cavity trees were killed from 1990 to 1993). Use of these techniques, which are currently awaiting Environmental Protection Agency approval, should reduce the number of cavity trees lost to SPB. It is recommended that a forest-wide standard and guideline be developed in the Management Plan and in each of the management areas to adopt these new techniques after they are approved and an amendment is made in the EIS for the suppression of the southern-pine beetle in the Southern Region.

¹ Evans, K.E. and Connor, R.N. 1979. Snag management. Pages 214-225 in Management of Northcentral and Northeastern Forests for Neotropical Birds, compiled by R.M. DeGraaf and K. Evans. USDA Forest Service. GTR NC-55.

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Chapter III. Current Research Needs, 1. Habitat requirements and ecosystem function, page 36
A review of the current research needs suggests that the science of ecosystems management is relatively new, local ecological classification types have not been completed for the National forests in Texas, and there is a lack of knowledge regarding occurrence and habitat requirements of Federally-listed species. Therefore, standards should be developed (for each management area) which allow amendments in species and habitat management as new information is obtained from species surveys and ecological classification identification.

Chapter IV. Desired Future Condition, page 44 While we agree that examples of natural succession on forest and grassland ecosystems will be demonstrated through more areas that are managed for special attributes, we are concerned that these may become the only areas within which ecosystems management will be implemented. The concept of a forestwide ecosystems management plan should be sincerely put into practice.

Chapter IV. Desired Future Condition, page 45 Language in the draft EIS provides for allowing development of oil and gas wells along major travelways. To reflect this in this section of the Management Plan, the statement regarding scenery along major travelways should be revised to read, "Scenery along most of the major travelways, lake shores, and river corridors will develop and maintain a variety of scenic qualities, including some areas with an older-forest character." It is further recommended that a statement in MA 1-62 and MA 2-62 be developed to include that well sites and associated facility locations may be placed in major roadways to reduce forest fragmentation.

Chapter IV. Management Objectives, page 48 We recommend adding the following phrase to statement 3(k), "and when Federally-listed threatened and/or endangered species will continue to be protected according to the Endangered Species Act." We also suggest changing the statement 4(d) to read, "Provide high quality pine and hardwood saw-timber and other forest products." Additionally, we question whether or not it will be feasible to supply a continual flow of high quality pine and hardwood products.

MA-1. Standards and Guidelines. Silvicultural Management, page 91. The diameter limits listed for scheduled regeneration cuttings are inconsistent with those in the draft EIS for the management of the RCW and its habitat on National forests in the Southern Region. Smaller diameter limits are acceptable if uneven-aged management is implemented, however, larger diameters are required when irregular shelterwood is used. Irregular shelterwood leaves older trees with larger diameters and these trees produce higher quality seed sources. Therefore, we recommend the diameter limits be increased to reflect those in the draft RCW EIS.

MA-1. Standards and Guidelines. Facilities, page 100 We recommend changing the statement in MA-2-16 to include language for forest fragmentation, i.e., "Restrictions may be implemented in response to resource programs, such as wildlife, forest fragmentation, recreation, "

MA-2. Standards and Guidelines, pages 99-111. Currently, the RCW recovery population for the coastal plain of east Texas has been identified by the U.S. Forest Service and the FWS as the population on the Sam Houston National Forest. This population primarily inhabits the loblolly and shortleaf pine/hardwood forests in this National forest. The proposed Revised Land and Resource Management Plan includes provisions to restore the longleaf-pine forest, which is the preferred habitat of the RCW. In the event the RCW population expands in the longleaf-pine forest (on the Angelina or Sabine National Forests) and exceeds that of the Sam Houston population, the U.S. Forest Service may want to redesignate the recovery population to these forests. The Sam Houston National Forest is proposed to be designated as an urban forest because of its close proximity to Houston, Texas. The demand for recreation (especially ORV trails), which is expected to increase, may conflict with management and recovery of the RCW on this forest. It is, therefore, recommended that a standard be included in MA-2 which allows for reconsideration of the location of the RCW recovery population in east Texas.

Chapter V. Table 2, page 241 Table 2 should be corrected to remove the dwarf salamander from the list for the "Longleaf-pine Woodlands & Savannas" and include the pileated woodpecker (*Dryocopus pileatus*) in the "Bottomlands Streambanks" category. Neotropical and breeding birds identified by the U.S. Forest Service in their proposed "Landbird Strategy" (The Southern National Forest's Migratory and Resident Landbird Conservation Strategy) should be added to the management indicator list. Proposed surveys for these species should provide information for monitoring the health of the forest. We support the "Landbird Strategy" in view of the lack of data on the occurrence and habitat requirements of both neotropical and breeding birds in east Texas. However, we are concerned that implementation of this strategy (i.e., available time of the district biologists) may replace management of Federally-listed species and other ongoing research projects in these National forests.

As a general observation, forest management indicator species have historically been used to evaluate the health of forest ecosystems. If the U.S. Forest Service plans to manage ecosystems, it may be more effective to continue to identify and monitor the status of the "Desired Future Condition" of ecosystems (i.e., acres of forested habitat restored, acres in each plant community) in the National forests, rather than look at individual or even groups of species. We therefore recommend using the Habitat Evaluation Procedures developed by the FWS for species which have been identified as management indicators in the various plant communities.

Appendix D. Endangered, Threatened and Sensitive Species, pages 1-6. This appendix contains some inaccurate information which should be corrected. The mountain plover (*Charadrius montanus*) is a Category 1 candidate species which should be added to the list. This species is an incidental visitor to north Texas which may occur on the grasslands during migration. The correct Federal status of the Louisiana black bear (*Ursus americanus luteolus*) is threatened. Appendix D lists this species as a Category 2 candidate species. Additionally, the American burying beetle (*Nicrophorus americanus*) is listed on page 4 of the Appendix. This species has not been documented in Texas and should be deleted from this list.

1808
9 of 10
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9

SUMMARY COMMENTS

The U S Forest Service is commended on the development of an ecosystem approach for managing the National forests and grasslands in Texas, as well as throughout the United States. Implementation of the preferred alternative and incorporation of the general and specific comments provided herein should restore the mature forest ecosystems in the National forests in Texas.

The bottomland hardwood areas which comprise approximately 10 percent of the total acreage of the National grasslands should be evaluated as a special management area. Limiting or restricting grazing in these areas should be considered. Prairie restoration through the removal of improved pasture and invader species, such as cedar and hackberry, and establishment of native grasses are encouraged. Oil and gas exploration and production, which permanently impacts the least amount of grassland habitat, are desired, with impacts to streams, riparian vegetation, and bottomland hardwoods avoided. Developed and dispersed recreational opportunities are important due to the proximity of the National grasslands to the Dallas/Fort Worth metropolitan area, but should not be emphasized over wildlife habitat management. Habitat management, which provides requisites important for endemic and migratory wildlife species, should be given equal or greater consideration.

Delineation of RCW Habitat Management Areas is expected to recover the Federally-listed RCW in the coastal plain of east Texas, as well as provide habitat for several listed (and unlisted) species. The recent U S Forest Service directive to survey National forests for two Federally-listed candidate species per year should provide us with much needed information for upgrading or delisting these species. However, a management standard needs to be developed to include this new directive into the EIS and Revised Land and Resource Management Plan for the National forests in Texas.

The preferred alternative emphasizes developed recreational opportunities, particularly ORV use, and mineral leasing on greater than half of the National forests in Texas. We recommend that the number of proposed ORV trails in the draft plan be reduced to avoid impacts to the RCW recovery population on the Sam Houston National Forest. Alternatively, the U S Forest Service may want to redesignate the RCW recovery population to a different National forest. The revised Land and Resource Management Plan includes provisions to restore the longleaf-pine forest, which is the preferred habitat of the RCW. In the event the RCW population expands into Angelina, Davy Crockett, and Sabine National Forests, and exceeds that of the Sam Houston population, the U S Forest Service may want to redesignate the recovery population to one of these forests. We are also concerned that the proposed alternative, which places a high priority on mineral leasing, may result in further loss in the amount and quality of the mature forest ecosystem and its associated Federally-listed species. Forest fragmentation from high commodity production is more likely to negatively impact listed species than the projected amount of forest loss in the draft EIS. We believe this strategy should be modified and evaluated in regard to the cumulative impacts from past, present, and proposed future activities.

We appreciate the opportunity to review these documents. We trust these comments will be of use during final document development.

Sincerely,



Glenn B. Sekavec
Regional Environmental Officer

1808
10 of 10
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10



DEPARTMENT OF THE ARMY
FORT WORTH DISTRICT CORPS OF ENGINEERS
P O BOX 17300
FORT WORTH, TEXAS 76102-0300

REPLY TO
ATTENTION OF

January 6, 1995

Planning Division

Mr Alan G Newman, Forest Supervisor
National Forests & Grasslands in Texas
701 N First Street
Lufkin, Texas 75901

Dear Mr Newman

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the U. S. Forest Service's proposed Revised Land and Resource Management Plan, National Forests and Grasslands in Texas, dated September, 1994. This project has been assigned Project Number 199400676. Please include this number in future correspondence concerning this project.

We have reviewed this Draft EIS relative to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899. Under Section 404, the U. S. Army Corps of Engineers (USACE) regulates the discharge of dredged and fill material into waters of the United States, including wetlands. Waters of the United States include any part of the surface water tributary system, from large rivers to small streams, and any lake, pond, or other waterbody on the tributary system, as well as wetlands. Waters of the United States can include man-made as well as natural areas. For example, abandoned construction and mining pits may be waters of the United States.

Our responsibility under Section 10 is to regulate any work in, or affecting, navigable waters of the United States. The Sam Houston, Angelina, and Sabine national forests border navigable waters of the United States. Enclosed for your information is a list of navigable waters of the United States in the Fort Worth District. Any of the above discharges or work may require Department of the Army authorization in the form of a permit.

Due to the general nature of the activities included in the proposed land and resource management plan, we are unable to determine from the Draft EIS whether Department of the Army authorization would be required. However, several types of activities discussed in the Draft EIS may require authorization

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if they occur in waters of the United States, including wetlands. Examples of ground-disturbing activities that may require authorization where they occur in waters of the United States include, but are not limited to, some timber harvesting and related timber management activities that are not part of an established operation; construction of roads, trails, and recreational facilities, construction of oil and gas exploration wells, access roads, and production facilities, and excavation of sand, gravel, and rock.

When a specific project that would require Department of the Army authorization is proposed, please contact our office and provide us with the details of the proposed work, including the type and amount of material, if any, to be discharged (both temporary and permanent discharges) into waters of the United States, the location of any work or discharges, and appropriate plan and cross-section views of the proposed work. We understand that in many cases the U. S. Forest Service would not be the party responsible for obtaining Department of the Army authorization. In these cases, we would encourage you to inform those coming to you for permits and/or information that they may need to contact the USACE regarding authorization under Section 404 and/or Section 10.

Thank you for your interest in our nation's water resources. If you have any questions concerning our regulatory program, please contact Mr. David Martin at the address above or telephone (817) 334-4625.

Sincerely,

Paul M. Hathorn
Chief, Environmental Resources Branch

no enclosure



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